

TSD File Inventory Index

Date August 1, 2005

Initial C.M. Kneen

Facility Name		<u>Apollo Plating, Inc.</u>	
Facility Identification Number		<u>MD 052 035 425</u>	
A.1 General Correspondence		B.2 Permit Docket (B.1.2)	
A.2 Part A / Interim Status		1 Correspondence	
1 Correspondence		2 All Other Permitting Documents (Not Part of the ARA)	
2 Notification and Acknowledgment		C.1 Compliance - (Inspection Reports)	
3 Part A Application and Amendments		C.2 Compliance/Enforcement	1
4 Financial Insurance (Sudden, Non Sudden)		1 Land Disposal Restriction Notifications	
5 Change Under Interim Status Requests		2 Import/Export Notifications	
6 Annual and Biennial Reports		C.3 FOIA Exemptions - Non-Releasable Documents	
A.3 Groundwater Monitoring		D.1 Corrective Action/Facility Assessment	
1 Correspondence		1 RFA Correspondence	
2 Reports		2 Background Reports, Supporting Docs and Studies	
A.4 Closure/Post Closure		3 State Prelim Investigation Memos	
1 Correspondence		4 RFA Reports	
2 Closure/Post Closure Plans, Certificates, etc		D.2 Corrective Action/Facility Investigation	
A.5 Ambient Air Monitoring		1 RFI Correspondence	
1 Correspondence		2 RFI Workplan	
2 Reports		3 RFI Program Reports and Oversight	
B.1 Administrative Record		4 RFI Draft /Final Report	

Total - 1

5 RFI QAPP		7 Lab data Soil Sampling/Groundwater	
6 RFI QAPP Correspondence		8 Progress Reports	
7 Lab Data, Soil-Sampling/Groundwater		D.5 Corrective Action/Enforcement	
8 RFI Progress Reports		1 Administrative Record 3008(h) Order	
9 Interim Measures Correspondence		2 Other Non-AR Documents	
10 Interim Measures Workplan and Reports		D.6 Environmental Indicator Determinations	
D.3 Corrective Action/Remediation Study		1 Forms/Checklists	
1 CMS Correspondence		E. Boilers and Industrial Furnaces (BIF)	
2 Interim Measures		1 Correspondence	
3 CMS Workplan		2 Reports	
4 CMS Draft/Final Report		F Imagery/Special Studies (Videos, photos, disks, maps, blueprints, drawings, and other special materials.)	
5 Stabilization		G.1 Risk Assessment	
6 CMS Progress Reports		1 Human/Ecological Assessment	
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D.4 Corrective Action Remediation Implementation		3 Enforcement Confidential	
1 CMI Correspondence		4 Ecological - Administrative Record	
2 CMI Workplan		5 Permitting	
3 CMI Program Reports and Oversight		6 Corrective Action Remediation Study	
4 CMI Draft/Final Reports		7 Corrective Action/Remediation Implementation	
5 CMI QAPP		8 Endangered Species Act	
6 CMI Correspondence		9 Environmental Justice	

Note: Transmittal Letter to Be Included with Reports
Comments _____



Waste, Pesticides and Toxics Division

Type of Document: ☐ Notice of Violation and Inspection Report/Checklist
☐ No Violation Letter and Inspection Report/Checklist
☒ Letter of Acknowledgment *RTC Letter*
☐ Information Request
☐ Pre-Filing and Opportunity to Confer
☐ State Notification of Enforcement Action

Facility Name : Apollo Plating, Inc.

Facility Location: 15765 Sturgeon Rd.

City: Roseville State: MI

U.S. EPA ID# MI052035425

Assigned Staff Bryan Gangwisch Phone: 6-0989

Name	Signature	Date
Author	<i>[Signature]</i>	<i>7/1/04</i>
Regional Counsel		
Section Chief	<i>[Signature]</i> for <i>PAUL Little</i>	<i>7-2-04</i>
Branch Chief		

Directions/Request for Clerical Support:

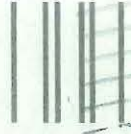
After the Section Chief/Branch Chief signs this sheet and original letter:

1. Date stamp the cover letter;
2. Make four copies of the contents of this folder:
 - One copy for the assigned staff;
 - One copy for the section file;
 - One copy for the branch file; and
 - One copy for the official file.
3. Make any additional copies for cc's or bcc's.
4. Mail the original certified mail and distribute office copies and cc's and bcc's.
Once the certified mail receipt is returned:
5. File the certified mail receipt (green card), with this sign-off sheet and the official file copy, and take to 7th floor RCRA file room;
6. E-mail staff the date that the letter was received by facility.

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 		A. Received by (Please Print Clearly) <u>S. HEADY</u> B. Date of Delivery <u>7/8/04</u>	
1. Article Addressed to: Mr. James E. Grimes President Apollo Plating, Inc. 15765 Sturgeon Road Roseville, Michigan 48066		C. Signature <u>S. Heady</u> <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No	
2. Article Number (Transfer from service label)		3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input checked="" type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.	
PS Form 3811, March 2001		4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes	
		7001 0320 0006 0293 9639	
Domestic Return Receipt		102595-01-M-1424	

U.S. Postal Service	
CERTIFIED MAIL RECEIPT	
(Domestic Mail Only; No Insurance Coverage Provided)	
<u>U.S. CPA</u> <u>Bryan Gangwisch, DE-9J</u>	
Postage	\$ <u>3.77</u>
Certified Fee	<u>2.30</u>
Return Receipt Fee (Endorsement Required)	<u>1.73</u>
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ <u>4.40</u>
Sent To Mr. James E. Grimes President Apollo Plating, Inc. 15765 Sturgeon Road Roseville, Michigan 48066	
PS Form 3800, January 2001	

UNITED STATES POSTAL SERVICE



First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

• Sender: Please print your name, address, and ZIP+4 in this box •

U.S. EPA
77 W. Jackson Blvd
Chicago, IL 60604

Attn: Bryan Gangwisch

DE-9J

9504+3511



Certified Mail Provides:

- A mailing receipt
- A unique identifier for your mailpiece
- A signature upon delivery
- A record of delivery kept by the Postal Service for two years

Important Reminders:

- Certified Mail may ONLY be combined with First-Class Mail or Priority Mail.
- Certified Mail is *not* available for any class of international mail.
- NO INSURANCE COVERAGE IS PROVIDED with Certified Mail. For valuables, please consider Insured or Registered Mail.
- For an additional fee, a *Return Receipt* may be requested to provide proof of delivery. To obtain Return Receipt service, please complete and attach a Return Receipt (PS Form 3811) to the article and add applicable postage to cover the fee. Endorse mailpiece "Return Receipt Requested". To receive a fee waiver for a duplicate return receipt, a USPS postmark on your Certified Mail receipt is required.
- For an additional fee, delivery may be restricted to the addressee or addressee's authorized agent. Advise the clerk or mark the mailpiece with the endorsement "Restricted Delivery".
- If a postmark on the Certified Mail receipt is desired, please present the article at the post office for postmarking. If a postmark on the Certified Mail receipt is not needed, detach and affix label with postage and mail.

IMPORTANT: Save this receipt and present it when making an inquiry.

PS Form 3800, January 2001 (Reverse)

102595-01-M-1049



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF
DE-9J

JUL 02 2004

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. James E. Grimes
President
Apollo Plating, Inc.
15765 Sturgeon Road
Roseville, MI 48066

Re: Return to Compliance
Apollo Plating, Inc.
EPA I.D. No.: MID 052 035 425

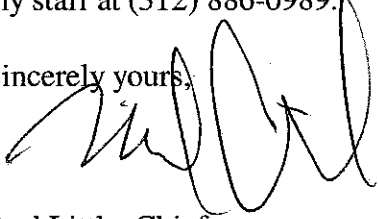
Dear Mr. Grimes:


On April 7, 2004, a representative of the United States Environmental Protection Agency (U.S. EPA) and a representative from the Michigan Department of Environmental Quality (MDEQ) inspected Apollo Plating, Inc., located in Roseville, Michigan. In response to the violations identified during the inspection, we issued a Notice of Violation to you on June 7, 2004. Subsequent to our Notice of Violation you submitted additional information regarding the identified violations in correspondence dated June 23, 2004.

This letter is to inform you that U.S. EPA has reviewed the referenced responses, and does not plan additional enforcement action at this time. This letter does not limit the applicability of the requirements evaluated, or of other federal or state statutes or regulations. The U.S. EPA and the MDEQ will continue to evaluate your facility in the future.

If you have any questions or concerns regarding this matter, please contact Bryan Gangwisch of my staff at (312) 886-0989.

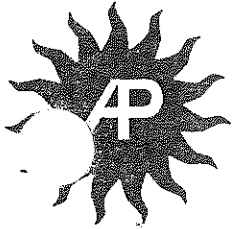
Sincerely yours,



 Paul Little, Chief
Compliance Section #2
Enforcement and Compliance Assurance Branch
Waste, Pesticides and Toxics Division

cc: Benedict Okwumabua
Waste & Hazardous Materials Division
Michigan Department of Environmental Quality
38980 Seven Mile Road
Livonia, Michigan 48152-1006

Mark Daniels, MDEQ- Southeast District



APOLLO PLATING, INC.

Meeting Expectations

15765 Sturgeon • Roseville, Michigan 48066

Phone: 586.777.0070 • Fax 586.777.7430

E-mail: www.apolloplatinginc.com

June 23, 2004

Via FedEx – next day air

U.S. EPA, Region 5
Enforcement and Compliance Assurance Branch (DE-9J)
77 W. Jackson Blvd.
Chicago IL 60604

Attn: Mr. Bryan Gangwisch

Re: Notice of Violation
Apollo Plating, Roseville, Michigan
EPA ID No. MID 052 035 425

Gentlemen:

In regard to the EPA's April 7, 2004, inspection, and the violations stated in the June 7, 2004, Notice of Violation letter from the EPA, Apollo Plating offers the following responses for your consideration. Appearing below are the numbered paragraphs from the June 7, 2004 EPA letter, followed by the company's response. An additional copy of this response is also enclosed.

1. ***In order to avoid the need for a hazardous waste storage license, a large quantity generator must clearly mark and make visible for inspection on its hazardous waste containers the date upon which each period of accumulation begins, and the hazardous waste number of the waste. See Michigan Administrative Code R299.9306(1)(b); 299.9502(1) [40 CFR § 262.34(a)(2) and (3); 270.1(c); and 270.10(a) and (d)].***

During the inspection of the hazardous waste storage area consisting of three (3) containers that were storing D002 waste from the cleaning of the zinc lines, the hazardous waste containers were stored in such a manner that the labels were not

readily visible for inspection. Apollo therefore failed to comply with the above-mentioned condition for a storage license exemption.

1. In order to show and maintain continuous ongoing compliance with Michigan Administrative Code R299.9306(1)(b); 299.9502(1) [40 CFR § 262.34(a)(2) and (3); 270.1(c); and 270.10(a) and (d)], Apollo Plating immediately adjusted presentation of the containers used to store D002 liquid waste to conform to the readily visible requirement of the above codes. See attached Photo #2 for current placement.
2. ***In order to avoid the need for a hazardous waste storage license, a large quantity generator must maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency, unless aisle space is not needed for any of these purposes. See MAC R 299.9306(1)(d); 40 CFR § 265.35 [40 CFR § 262.34(a)(4)]. This is also a requirement for owners and operators of hazardous waste storage facilities, under 40 CFR § 265.35 and MAC R299.9601(3).***

During the inspection of the same hazardous waste storage area as mentioned above, the aisle space between the containers storing D002 waste was insufficient. Pallets of empty containers/containers with parts were stored directly next to the hazardous waste storage area. Also, the hazardous waste storage drums were right up against the perimeter wall of the facility, as passage was not possible to inspect all of the labels. Apollo therefore has failed to comply with the above-referenced conditions for a license exemption, and has violated the storage facility aisle space requirements.

2. In order to show and maintain continuous and ongoing compliance with Michigan Administrative Code R 299.9306(1)(d); 40 CFR § 265.35 [40 CFR § 262.34(a)(4)], Apollo Plating immediately established the required aisle space to allow access to stored containers of D002 liquid waste from any and all approaches. Additionally, a permanent identified storage area was established. See attached Photo #2.
3. ***In order to avoid the need for a hazardous waste storage license, a large quantity generator must provide a containment system that has sufficient capacity to contain 10% of the volume (free liquids) of containers or the volume of the largest container, whichever is***

greater. See, MAC R299.9306(1)(a)(i), 40 CFR § 264.175(b)(3). This is also a requirement for owners and operators of hazardous waste storage facilities, under MAC R299.9601(2)(g) and R299.9614(1)(a).

During the inspection of the same hazardous waste storage area mentioned above, the hazardous waste (D002) storage containers were elevated on pallets, however there was no containment system to sufficiently contain any potential leak, discharge, or spill. Apollo therefore has failed to comply with the above-referenced conditions for a license exemption, and has violated the storage facility containment system requirements.

3. In order to show and maintain continuous and ongoing compliance with Michigan Administrative Code 299.9306(1)(a)(i), 40 CFR § 264.175(b)(3), Apollo Plating immediately moved the D002 liquid waste containers onto liquid containment pallets of sufficient capacity to contain 10% of the volume of free liquids of stored containers or the volume of the largest container stored thereon, in the event of a leak, discharge or spill. See attached Photo #2.
4. *In order to avoid the need for a hazardous waste storage license, a large quantity generator must ensure that facility personnel with hazardous waste management responsibilities successfully complete an initial training program which includes all the elements of 40 CFR § 265.16(d) and is directed by a person trained in hazardous waste management procedures; and receive review training annually thereafter. See, MAC R299.9306(1)(d), 40 CFR § 265.16(a)-(c) [40 CFR § 262.34(a)(4)]. This is also required of owners and operators of hazardous waste storage facilities, under MAC R299.9601(3)(b), 40 CFR § 265.16(a)-(c), MAC R299.9605(1), and 40 CFR §§ 264.16(a)-(c).*

During the inspection of records, Apollo personnel stated that employees are properly trained and thoroughly familiar with waste handling procedures specific to this facility, but there were no records or documentation of a training syllabus provided and no other documentation was provided in lieu of a RCRA component. Therefore, Apollo has failed to comply with the above-referenced condition for a license exemption, and has violated the storage facility training requirements.

4. In order to demonstrate compliance and training of facility personnel with the responsibilities associated with hazardous waste management per 40 CFR § 265.16(d), Apollo Plating is submitting for review of compliance document identified as Attachment F

In order to demonstrate compliance of training by an individual trained in hazardous waste management and annual review training per Michigan Administrative Code R299.9306(1)(d), 40 CFR § 265.16(a)-(c) [40 CFR § 262.34(a)(4)]. Apollo Plating is submitting for review of compliance documents identified as Attachments G and H.

5. *A universal waste small quantity handler shall manage used electric lamps in a manner that prevents breakage or the release of any universal waste or components of universal waste by containing unbroken lamps in structurally sound packaging that is compatible with the contents of the lamps and will prevent breakage during normal handling conditions. The packaging shall remain closed and lack evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions. Also, the lamps or packaging in which the lamps are contained shall be labeled with the words "universal waste electric lamps", "waste electric lamps", or "used electric lamps." A small quantity handler of universal waste who accumulates universal waste must be able to demonstrate the length of time that the universal waste has been accumulated from the date it becomes a waste or is received. See, MAC R299.9228(4)(c)(ii), 299.9228(4)(c)(iv), and 299.9228(4)(a) [40 CFR § 273.13(d); 273.14(e); and 273.15(c)].*

During the inspection of the general floor operations, there were waste electric lamps stored in three 55-gallon containers. The waste lamps were not properly contained to prevent breakage, not dated, or labeled with the words "waste electric lamps." Therefore, Apollo has violated the small quantity handler requirement for properly containing waste lamps.

5. In order to show and maintain continuous, ongoing compliance with Michigan Administrative Code R299.9228(4)(c)(ii), 299.9228(4)(c)(iv), and 299.9228(4)(a) [40 CFR § 273.13(d); 273.14(e); and 273.15(c)], Apollo Plating immediately, the day following inspection, moved to proper storage containers all identified waste electric lamps. Additionally, a permanent identified storage area was established. See attached Photo # 1.

6. *A large quantity generator who accumulates hazardous waste on-site for 90 days or less, and who does not meet the conditions for a license exemption of MAC R 299.9306(1)-(2) [40 CFR § 262.34(a)], is an operator of a hazardous waste storage facility, and is required to obtain a hazardous waste storage license. See, MAC R299.9502(1), 299.9508, and 299.9510 [40 CFR §§ 270.1, 270.10, 270.13]. On failing to comply with the above-referenced conditions for a permit exemption, Apollo's failure to apply for and obtain a storage license violated these licensing requirements.*
6. In order to show license exemption conditions are maintained in accordance with Michigan Administrative Code R299.9306(1)-(2) [40 CFR § 262.34(a)], Apollo Plating has complied with all items as contained in the Notice of Violation referred to herein.

*

*

*

Additional Information

1. Please provide the following information regarding Apollo's hazardous waste management at its facility located at 15765 Sturgeon Road, Roseville, Michigan 48066:

a. State the specific efforts Apollo has taken, or plans to take, to correct the noncompliances and violations set forth in the Notice of Violation (NOV) above;

a. As noted in the NOV, the items deemed to be out of compliance have been brought into compliance as follows:

The areas previously used as storage for universal waste, D002 liquids and F006 debris storage have been relocated to an open, well-lighted, permanent storage location. See attached Photo #4. Apollo Plating has prepared a written syllabus for training purposes and has also expanded the training for individuals assigned to hazardous waste management responsibilities per Attachments A-F.

b. State and provide documentation of all capital and operation and maintenance costs incurred to correct the violations set forth in the NOV above;

b. In order to rectify conditions as listed within the NOV, Apollo

Plating incurred operating and maintenance costs as follows:

1. Purchase of universal waste containment dunnage at a cost of \$40.00. See Attachment I.
2. Hazardous waste management training as provided through an outside entity at a cost of \$1000.00. See Attachment J.

c. If any of the violations set forth in the NOV are continuing, submit Apollo's plan for returning to compliance.

c. Each of the items listed within the NOV have been brought into compliance.

2. For each facility employee that received annual or initial hazardous waste training in 2002, provide the following information:

a. State whether any type of hazardous waste training was provided to the employee at any time during 2003;

a. All applicable employees received hazardous waste management training during 2003. See Attachments A-E.

b. If hazardous waste training was provided to the employee in 2003, provide the date of the training;

b. Training was conducted on November 5 and November 11, 2003.

c. Provide the name of the person(s) who provided the employee's hazardous waste training in 2003;

c. Argyri Ioannou

d. Provide a true and accurate copy of all records, including electronic records, in Apollo's control, that document or support the information provided in response to 2(a)-(c) above.

d. See Attachments A-E, G-H.

3. For each provider of hazardous waste training listed in response to item 2.c above, provide the following information:

a. State whether the provider was trained in hazardous waste management procedures at the time that the provider trained the employee in hazardous waste management.

a. Ms. Ioannou was originally trained in August of 1998 and received refresher training on November 5, 2003. See Attachments G and H.


Apollo Plating, Inc.

By


James E. Grimes
President

STATE OF MICHIGAN)
)ss
COUNTY OF MACOMB)

On this 23rd day of June, 2004, before me personally appeared the above-named JAMES E. GRIMES, who made oath that all statements made herein are true to the best of his knowledge, information and belief.


Sandra Domine, Notary Public
St. Clair County, Michigan
Acting in Macomb County, Michigan
My commission expires: Aug. 9, 2008

cc: Mr. Benedict Okwumabua
Michigan Department of Environmental Quality
Waste & Hazardous Materials Division
Southeast State Office Building
38980 Seven Mile Road
Livonia MI 48152-0989
(via FedEx, next day air)

EMPLOYEE HAZARDOUS WASTE TRAINING

RECORDS

PERSONNEL MUST RECEIVE INITIAL TRAINING WITHIN SIX MONTHS AFTER THE DATE OF THEIR EMPLOYMENT OR ASSIGNMENT TO A JOB THAT IS RELATED TO THE MANAGEMENT OF HAZARDOUS WASTE. AFTER THE INITIAL TRAINING FACILITY PERSONNEL MUST BE TRAINED ANNUALLY.

EMPLOYEE NAME: ARGYRI P IOANNOU

JOB TITLE: ENVIRONMENTAL MANAGER

JOB DESCRIPTION:

MONITORING THE PRETREATMENT SYSTEM FOR COMPLIANCE
IN CHARGE OF HAZARDOUS WASTE FOR THE FACILITY
EMERGENCY COORDINATOR
STORM WATER CERTIFY OFFICER
WATER RECYCLING SYSTEM

INITIAL TRAINING: DEC 08, 1995

ANNUAL TRAINING: NOV 5, 2003

TYPES AND AMOUNT OF TRAINING:

ARGYRI P IOANNOU HAD ON THE JOB TRAINING FOR

COMMUNICATIONS SYSTEMS
EMERGENCY PROCEDURES
RESPONSE TO FIRES OR EXPLOSIONS
SHUTDOWN OF OPERATIONS
RESPONSE TO UNPLANNED SUDDEN OR NON-SUDDEN RELEASES OF HAZARDOUS WASTE
CONSTITUENTS TO AIR, SOIL OR SURFACE WATER
CONTINGENCY PLAN IMPLEMENTATION
SLUG/SPILL PREVENTION PLAN

ONE DAY CLASSROOM TRAINING ON

REGULATION 101
MATERIAL SAFETY DATA SHEETS
RIGHT -TO- KNOW
HAZARDOUS MATERIALS HANDLING
CONFINED SPACES ENTRY
STORM WATER OPERATOR AND CERTIFY OFFICER
RCRA/PART III COMPLIANCE
ENVIRONMENTAL LAW, HEALTH AND SAFETY
ISO 14000

NOTE: ANY PERSONNEL TRAINING PROVIDED WILL INCLUDE ANY UPDATES/REVISIONS TO THE CONTINGENCY PLAN.

SIGN: Argyri P Ioannou

EMPLOYEE HAZARDOUS WASTE TRAINING

RECORDS

PERSONNEL MUST RECEIVE INITIAL TRAINING WITHIN SIX MONTHS AFTER THE DATE OF THEIR EMPLOYMENT OR ASSIGNMENT TO A JOB THAT IS RELATED TO THE MANAGEMENT OF HAZARDOUS WASTE. AFTER THE INITIAL TRAINING FACILITY PERSONNEL MUST BE TRAINED ANNUALLY.

EMPLOYEE NAME TODD MCNULTY

JOB TITLE: VICE PRESIDENT OF ENGINEERING

JOB DESCRIPTION:

MACHINE REPAIR
ELECTRICIAN
EQUIPMENT ENHANCEMENTS
GENERAL MAINTENANCE
TOOL DESIGN

INITIAL TRAINING: DEC 09, 1995

ANNUAL TRAINING: NOV 11, 2003

TYPES AND AMOUNT OF TRAINING:

ON THE JOB TRAINING FOR SIX MONTHS

EMERGENCY SYSTEMS (COMMUNICATION & ALARMS)
EMERGENCY EQUIPMENT (WATER MAINS, GLOVES, BREATHING APPARATUS, FIRE EXTINGUISHERS).
RESPONSE TO FIRES OR EXPLOSIONS
SHUT DOWN OPERATIONS
CONTINGENCY PLAN IMPLEMENTATION

ONE DAY CLASSROOM TRAINING ON

HAZARDOUS MATERIALS
RIGHT TO KNOW
CONFINED SPACES ENTRY

NOTE: ANY PERSONNEL TRAINING PROVIDED WILL INCLUDE ANY UPDATES/REVISIONS TO THE CONTINGENCY PLAN.

SIGN: 

F-0400-09-68
REV 8/98

EMPLOYEE HAZARDOUS WASTE TRAINING

RECORDS

PERSONNEL MUST RECEIVE INITIAL TRAINING WITHIN SIX MONTHS AFTER THE DATE OF THEIR EMPLOYMENT OR ASSIGNMENT TO A JOB THAT IS RELATED TO THE MANAGEMENT OF HAZARDOUS WASTE. AFTER THE INITIAL TRAINING FACILITY PERSONNEL MUST BE TRAINED ANNUALLY.

EMPLOYEE NAME: _ DAVE SHOVE

JOB TITLE: MAINTENANCE DEP. SUPERVISOR

JOB DESCRIPTION:

MACHINE REPAIR
ELECTRICIAN
EQUIPMENT UPDATE
GENERAL MAINTENANCE

INITIAL TRAINING: MAY 06, 1996

ANNUAL TRAINING: NOV 11, 2003

TYPES AND AMOUNT OT TRAINING:

ON THE JOB TRAINING ON

EMERGENCY SYSTEMS (COMMUNICATIONS & ALARMS)
EMERGENCY EQUIPMENT (WATER MAINS , GLOVES , BREATHING
APPARATUS, FIRE EXTINGUISHERS)
RESPONSE TO FIRES OR EXPLOSIONS
SHUT DOWN OPERATIONS
CONTINGENCY PLAN IMPLEMENTATION

ONE DAY CLASSROOM TRAINING ON

HAZARDOUS MATERIALS
RIGHT TO KNOW
CONFINED SPACES ENTRY
STORM WATER POLLUTION PREVETION

NOTE: ANY PERSONNEL TRAINING PROVIDED WILL INCLUDE ANY UPDATES/REVISIONS TO THE CONTINGENCY PLAN.

SIGN: *Dave Shove*

EMPLOYEE HAZARDOUS WASTE TRAINING RECORDS

PERSONNEL MUST RECEIVE INITIAL TRAINING WITHIN SIX MONTHS AFTER THE DATE OF THEIR EMPLOYMENT OR ASSIGNMENT TO A JOB THAT IS RELATED TO THE MANAGEMENT OF HAZARDOUS WASTE. AFTER THE INITIAL TRAINING FACILITY PERSONNEL MUST BE TRAINED ANNUALLY.

EMPLOYEE NAME: JOHN DEAN

JOB TITLE: WASTE TREATMENT TECHNICIAN

JOB DESCRIPTION:

DAILY EFFLUENT ANALYSIS
DAILY FILTER CAKE DUMPING
FILTER CAKE DRYING
INSPECTION OF ROLL OFF WEEKLY
WASTE TREATMENT CHEMICAL MAKE UP
TRANSFERRING HAZARDOUS WASTE TO THE ROLL OFF BOX
RIGHT- TO - KNOW LAW
HANDLING OF HAZARDOUS MATERIALS

INITIAL TRAINING: DEC 09, 1995

ANNUAL TRAINING: NOV 11, 2003

TRAINED BY: ENVIRONMENTAL MANAGER

TYPES AND AMOUNT OT TRAINING: THE ABOVE EMPLOYEE HAS BEEN TRAINED FOR THREE (3) MONTHS ON THE FOLLOWING TOPICS.

EMERGENCY PROCEDURES
EMERGENCY SYSTEMS (SUCH AS COMMUNICATION SYSTEMS)
RESPONSE TO FIRES OR EXPLOSIONS
CONTINGENCY PLAN
SLUG/SPILL PREVENTION PLAN
MATERIAL SAFETY DATA SHEETS
STORM WATER POLLUTION

NOTE: ANY PERSONNEL TRAINING PTOVIDED WILL INCLUDE ANY UPDATES/REVISIONS TO THE CONTINGE NCY PLAN.

SIGN:

04-09-168-AP
REV 8/1998

EMPLOYEE HAZARDOUS WASTE TRAINING

RECORDS

PERSONNEL MUST RECEIVE INITIAL TRAINING WITHIN SIX MONTHS AFTER THE DATE OF THEIR EMPLOYMENT OR ASSIGNMENT TO A JOB THAT IS RELATED TO THE MANAGEMENT OF HAZARDOUS WASTE. AFTER THE INITIAL TRAINING FACILITY PERSONNEL MUST BE TRAINED ANNUALLY.

EMPLOYEE NAME: AURTHER ROBERSON

JOB TITLE: WASTE TREATMENT TECHNICIAN

JOB DESCRIPTION:

DUMP FILTER CAKE FROM FILTER PRESS
DRY FILTER CAKE
SWEEP AROUND WASTE TREATMENT
TRANSFER FILTER CAKE TO ROLL-OFF BOX
INSPECT MIXERS ON THE WASTE TREATMENT
GENERAL HOUSEKEEPING

INITIAL TRAINING: APRIL 24, 2002

ANNUAL TRAINING: NOV 11, 2003

ANNUAL TRAINING: TYPES AND AMOUNT OT TRAINING:

AUTHER HAD 2 MONTHS ON THE JOB TRAINING ON THE
EMERGENCY PROCEDURES

COMMUNICATIONS

CONTINGENCY PLAN

SLUG/SPILL PREVENTION PLAN

ONE DAY CLASSROOM INSTRUCTIONS VIDEOS ON

HOW TO HANDLE HAZARDOUS MATERIALS

CONFINED SPACES.

MATERIAL SAFETY DATA SHEETS

STORM WATER POLLUTION PREVENTION

NOTE: ANY PERSONNEL TRAINING PROVIDED WILL INCLUDE ANY
UPDATES/REVISIONS TO THE CONTINGENCY PLAN.

SIGN:

04-09-168-AP
REV 8/98



Attachment F

Apollo Plating, Inc.

Title: **Hazardous Waste Management Training**
Document Number: **03-09-421-AP**
Approved: Environmental Manager

Revision Number: **00**
Date: 4/8/04

SYLLABUS OF HAZARDOUS WASTE MANAGEMENT TRAINING

40 CFR 261.3, 261.4(b), 261.24 and 262.11 – Facilities that generate solid waste must determine if the waste is hazardous waste.

40 CFR 261.5 – Generators of no more than 100 kg per month of hazardous waste or 1 kg of acutely hazardous waste may qualify as a Conditionally Exempt Small Quantity Generator (CESQG) when they meet specific requirements.

40 CFR 262.34(d)(1)(4) , 262.34(e)(f) – Generators of more than 100 kg, but less than 1,000 kg, of hazardous waste per month, shall qualify as a Small Quantity Generator (SQG), which can accumulate hazardous waste on-site for 180 days (or 270 days) without a permit if specific conditions are met.

40 CFR 262.12(a)(b) and 265.11 – SQG's that generate, transport, or handle hazardous waste must obtain an EPA identification number.

40 CFR 262.12(a)(b) – Large Quantity Generator (LOQ). A generator that generates, transports, or handles hazardous waste must obtain an EPA identification number.

40 CFR 262.34(a)(2)(3) and 262.34(b) – Generators may accumulate hazardous waste on-site for 90 days or less without a permit or interim status provided they meet certain conditions.

40 CFR 262.12(c) – Generators must not offer their waste to transporters or a Treatment Storage Disposal Facility (TSDF) that have not received an EPA identification number.

40 CFR 262.20, 262.40(a)(b)(d) and 262.42(a) – Generators are required to use manifests exception reports and maintain records.

40 CFR 262.40(c) - Generators are required to keep records of waste analyses, tests, and waste determinations.

40 CFR 262.34(a)(4), 265.30-265.37 – Generator storage areas must be designed, constructed, maintained, and operated to minimize the possibility of a fire, explosion or any unplanned release of hazardous waste or constituents, which could threaten human health or the environment.

PERSONNEL TRAINING

40 CFR 262.34(a)(4), 265.16(a)-(c) – All facility personnel who handle hazardous waste must meet certain training requirements:

- Identification of hazardous wastes
- Container use, marking, labeling, and on-site transportation
- Manifesting and off-site transportation

90 day storage area management
Personnel health and safety, and fire safety

The training program includes contingency plan implementation and is designed to ensure that facility personnel are able to respond to emergencies, including:

- Procedures for using, inspecting, repairing and replacing emergency and monitoring Equipment
- Operation of communications and alarm systems
- Response to fire or explosion
- Response to ground water contamination incidents
- Response to leaks or spills
- Shutdown of operations

40 CFR 262.34(a), 265.16(d)(e) – Training records must be maintained for all facility staff who manages hazardous waste.

CONTINGENCY PLANS AND EMERGENCY COORDINATOR

40 CFR 262.34(a)(4), and 265.50-265.54 – Generators must have a contingency plan.

40 CFR 262.34(1)(4) and 265.55 – Each generator must have an emergency coordinator on the facility premises or on call at all times.

40 CFR 262.34(a)(4) and 265.56(a)-(i) – Emergency coordinators at generators must follow certain emergency procedures whenever there is an imminent or actual emergency situation.

40 CFR 262.34(a)(4) and 265.56(j) – Generator operators must record the time, date and details of any incident that requires implementing the contingency plan.

CONTAINERS

40 CFR 261.7 – Empty containers at generators previously holding hazardous waste must meet the regulatory definition of empty before they are exempted from hazardous waste requirements.

40 CFR 262.34(a)(1)(i) and 265.172 – Containers used to store hazardous waste at generators must be in good condition and not leaking. Containers used at generators must be made of or lined with materials compatible with the waste stored in them.

40 CFR 262.34(a)(1)(i) and 265.173 – Containers must be closed during storage and handled in a safe manner at generators.

40 CFR 262.34(a)(1)(i) and 265.177 – The handling of incompatible wastes and materials in containers at generators must comply with safe management practices. Containers used to store hazardous waste at generators should be managed in accordance with specific Management Practices (MP).

REFERENCES

QUALITY RECORDS

INTEGRATED ENVIRONMENTAL, INC.

Certificate of Achievement

This Is To Certify That:

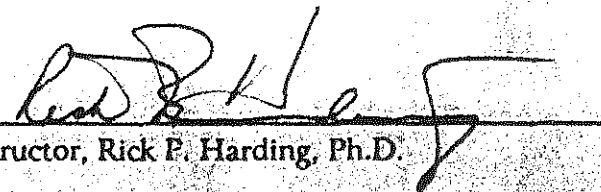
Argyri P. Ioannou

has completed the following course:

RCRA/Part 111 Compliance and Right-To-Know
Training Course for Metal Finishers

August 4, 1998

Date



Instructor, Rick P. Harding, Ph.D.

Attachment 6



REGISTRATION FORM

REGISTRATION FEE = \$50

Includes continental breakfast, lunch, workshop materials, and WREception.

CANCELLATION DEADLINE

October 30, 2003

CANCELLATION POLICY

Cancellations after October 30th or no-shows will still be responsible for the registration fee and will be invoiced.

PAYMENT

Make checks payable to:

STATE OF MICHIGAN. Mail or fax registration and mail fee to:

Marlene Osborne
Environmental Science and
Services Division
Michigan Department of
Environmental Quality
P.O. Box 80457
Lansing, Michigan 48909-7957

Fax: 517-335-4729

Email: osbornem@michigan.gov

*We are unable to accept credit card payments.

Name & Title: Argyri Ioannou Environmental Mgrs

Company: Apollo Plating, Inc.

Address: 15765 Sturgeon

City/State/Zip Code: Roseville MI 48066

Business Phone: (586) 777-0070

Email Address: nonresponsive

Those providing

Special Dietary Needs:

PLEASE CHECK THE BOX THAT BEST DESCRIBES YOUR COMPANY OR ORGANIZATION:

- | | |
|---|--|
| <input type="checkbox"/> Business/trade association | <input type="checkbox"/> Manufacturing (SIC Code _____) |
| <input type="checkbox"/> Educational institution | <input type="checkbox"/> Safety/health organization |
| <input type="checkbox"/> Environmental consultant | <input type="checkbox"/> State government |
| <input type="checkbox"/> Environmental group | <input type="checkbox"/> Utility |
| <input type="checkbox"/> Local government | <input checked="" type="checkbox"/> Other <u>Electroplater</u> |

COMPANY SIZE (please check one):

- ☐ 1-50 employees
☒ 51-150 employees
☐ 151 to 250 employees
☐ 251 to 500 employees
☐ Over 500 employees

Please select the breakout sessions you plan to attend (one per time period).

Time	DfE	Recycling	Energy Efficiency	Land Use	Expo
9:15 am	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
10:15 am	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
11:15 am	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Water Conservation	Sustainability	Energy Efficiency	Green Facility	Expo
1:00 pm	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2:00 pm	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3:00 pm	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3:45 pm	<input type="checkbox"/> Check here to attend the WREception with Expo participants, co-sponsors, and attendees				

Facility Information & Directions

- The workshop will be held on Wednesday, November 5, 2003, at the **Burton Manor, 27777 Schoolcraft Road, Livonia, Michigan**. Free parking is available on-site.
- From the East:** I-96 West (Jeffries Fwy.). Exit 177 (Inkster Road). Merge onto Schoolcraft Road (service drive) going west. Through the light then left onto Cardwell Street. Burton Manor entrance is directly across.
- From the West:** I-96 East. Exit 176 (Middlebelt Road). Merge onto Schoolcraft Road (service drive). Burton Manor will be on the right, 3/4 mile east of Middlebelt.
- From Detroit Metro Airport:** Take I-94 West, exit I-275 North. Exit I-96 East. Follow directions from the West.

Hotel Information & Directions

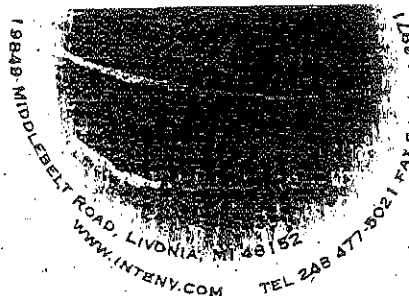
- A block of rooms has been reserved at the **Comfort Inn Live 29235 Buckingham, Livonia, Michigan**, until October 21, 2003, at a rate of \$79 plus taxes under Group Code: MDEQ. Call 734-458-7111 to make reservations.
- Take I-96 to Exit 176 (Middlebelt Road). Merge onto Schoolcraft Road. Turn left onto Middlebelt Road. Olive Garden and Chi-Chi's restaurants are on the northeast corner. Turn right onto Buckingham (located next to Olive Garden). Hotel is on right side.

If you have a disability which requires special accommodations at the workshop facility, please notify Mary Goodhall at 517-241-7968 a week in advance.

Attachment H

\$40.00

Attachment J



June 11, 2004

Apollo Plating, Inc.
15765 Sturgeon
Roseville, Michigan 48066

Attention: Argyi P. Ioannou
Environmental Manager

Regarding: RCRA Training

Dear Ms. Ioannou:

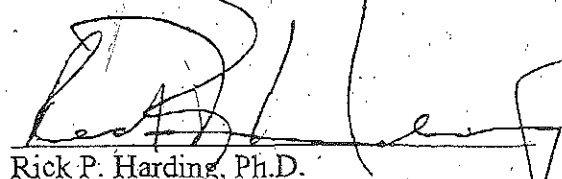
Per our June 10, 2004 telephone conversation, Integrated Environmental, Inc. (Integrated) is pleased to provide Apollo Plating, Inc. (Apollo) with this cost estimate for completion of training that satisfies the requirements for large quantity generators pursuant to the Resource Conservation and Recovery Act (RCRA). It is Integrated's understanding that 10 Apollo employees will be attending the training which is to take place at your facility between July 6 and July 16, 2004. Additionally, Integrated will provide one master copy of the training material handouts for Apollo to copy and distribute to the training attendees.


Integrated will conduct the training as described above for the lump sum amount of \$1,000.

Should you have any questions, please feel free to contact Integrated at (248) 477-5021.

Very truly yours,

INTEGRATED ENVIRONMENTAL, INC.


Rick P. Harding, Ph.D.
Senior Principal


Jason A. McHugh, CHMM
Project Manager

cc: File



INTEGRATED ENVIRONMENTAL, INC.



Photo 1

D-002

Photo 2

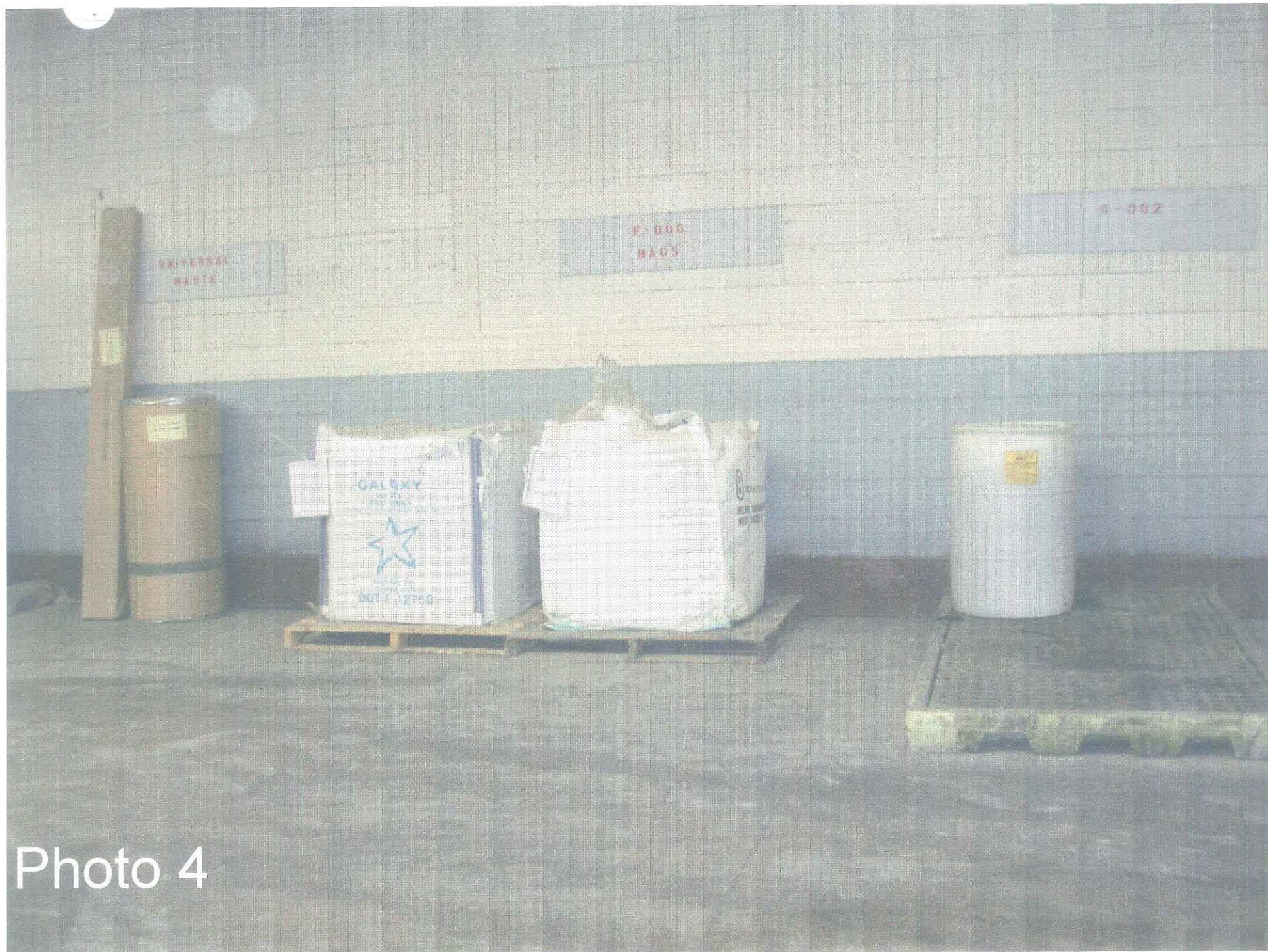


Photo 4

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

U.S. EPA
77 W JACKSON BLVD, DE-91
CHICAGO, ILLINOIS 60604
ATTN: BRYAN GANGWISCH

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 5.37



Postmark
Here

Sent To	Argyri Ioannou, Environmental Manager
Street, Apt. No. or PO Box No.	Apollo Plating, Inc. 15765 Sturgeon Road
City, State, ZIP	Roseville, Michigan 48066

PS Form 3800, January 2001

See Reverse for Instructions

7001 0320 0006 0177 3319



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF

JUN 07 2004

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

DE-9J

Argyri Ioannou, Environmental Manager
Apollo Plating, Inc.
15765 Sturgeon Road
Roseville, Michigan 48066

Re: Notice Of Violation
Apollo, Roseville, Michigan
EPA ID No.: MID 052 035 425

Dear Ms. Ioannou:

On April 7, 2004, a representative of the United States Environmental Protection Agency (U.S. EPA) and a representative of the Michigan Department of Environmental Quality (MDEQ) inspected Apollo Plating, Inc., located in Roseville, Michigan. The purpose of the inspection was to evaluate Apollo's compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA); specifically, those regulations related to the generation, treatment and storage of hazardous waste. Please find enclosed a copy of the inspection report for your reference.

Based on information provided by Apollo personnel, review of records, and physical observations by the inspectors, U.S. EPA finds that Apollo is engaged in the management of hazardous waste without a hazardous waste storage license, and is in violation of the requirements of the Michigan Administrative Code and the United States Code of Federal Regulation (CFR). To be eligible for the exemption from having a hazardous waste storage license, Apollo must be in compliance with the conditions of Michigan Administrative Code R299.9306 [40 CFR § 262.34]. Specifically, we find that Apollo is in noncompliance with the following conditions for a storage license exemption, and in violation of the following requirements:

1. In order to avoid the need for a hazardous waste storage license, a large quantity generator must clearly mark and make visible for inspection on its hazardous waste containers the date upon which each period of accumulation begins, and the hazardous waste number of the waste. See, Michigan Administrative Code, R299.9306(1)(b); 299.9502(1) [40 CFR § 262.34(a)(2), and (3); 270.1(c) and 270.10(a) & (d)].

During the inspection of the hazardous waste storage area consisting of three (3) containers that were storing D002 waste from the cleaning of the zinc line, the hazardous waste containers were stored in such a manner that the labels were not visible for inspection. Apollo therefore failed to comply with the above-mentioned condition for a storage license exemption.

2. In order to avoid the need for a hazardous waste storage license, a large quantity generator must maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency, unless aisle space is not needed for any of these purposes. See, MAC R299.9306(1)(d), 40 CFR § 265.35 [40 CFR § 262.34(a)(4)]. This is also a requirement for owners and operators of hazardous waste storage facilities, under 40 CFR § 265.35 and MAC R299.9601(3).

During the inspection of the same hazardous waste storage area as mentioned above, the aisle space between the containers storing the D002 waste was insufficient. Pallets of empty containers/containers with parts were stored directly next to the hazardous waste storage area. Also, the hazardous waste storage drums were right up against the perimeter wall of the facility, as passage was not possible to inspect all of the labels. Apollo therefore has failed to comply with the above-referenced conditions for a license exemption, and has violated the storage facility aisle space requirements.

3. In order to avoid the need for a hazardous waste storage license, a large quantity generator must provide a containment system that has sufficient capacity to contain 10% of the volume (free liquids) of containers or the volume of the largest container, whichever is greater. See, MAC R299.9306(1)(a)(i), 40 CFR § 264.175(b)(3). This is also a requirement for owners and operators of hazardous waste storage facilities, under MAC R299.9601(2)(g) and R299.9614(1)(a).

During the inspection of the same hazardous waste storage area as mentioned above, the hazardous waste (D002) storage containers were elevated on pallets, however there was no containment system to sufficiently contain any potential leak, discharge, or spill. Apollo therefore has failed to comply with the above-referenced conditions for a license exemption, and has violated the storage facility containment system requirements.

4. In order to avoid the need for a hazardous waste storage license, a large quantity generator must ensure that facility personnel with hazardous waste management responsibilities successfully complete an initial training program which includes all the elements of 40 CFR § 265.16(d) and is directed by a person trained in hazardous waste management procedures; and receive review training annually thereafter. See, MAC R299.9306(1)(d), 40 CFR § 265.16(a)-(c) [40 CFR § 262.34(a)(4)]. This is also required of owners and operators of hazardous waste storage facilities, under MAC R299.9601(3)(b), 40 CFR § 265.16(a)-(c), MAC R299.9605(1), and 40 CFR §§ 264.16(a)-(c).

During the inspection of records, Apollo personnel stated that employees are properly trained and thoroughly familiar with waste handling procedures specific to this facility, but there were no records or documentation of a training syllabus provided and no other documentation was provided in lieu of a RCRA component. Therefore, Apollo has failed to comply with the above-referenced conditions for a license exemption, and has violated the storage facility training requirements.

5. A universal waste small quantity handler shall manage used electric lamps in a manner that prevents breakage or the release of any universal waste or components of universal waste by containing unbroken lamps in structurally sound packaging that is compatible with the contents of the lamps and will prevent breakage during normal handling conditions. The packaging shall remain closed and lack evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions. Also, the lamps or packaging in which the lamps are contained shall be labeled with the words "universal waste electric lamps", "waste electric lamps", or "used electric lamps." A small quantity handler of universal waste who accumulates universal waste must be able to demonstrate the length of time that the universal waste has been accumulated from the date it becomes a waste or is received. See, MAC R299.9228(4)(c)(ii), 299.9228(4)(c)(iv), and 299.9228(4)(a) [40 CFR § 273.13(d); 273.14(e); and 273.15(c)].

During the inspection of the general floor operations, there were waste electric lamps stored in three 55-gallon containers. The waste lamps were not properly contained to prevent breakage, not dated, or labeled with the words "waste electric lamps." Therefore, Apollo has violated the small quantity handler requirement for properly containing waste lamps.

6. A large quantity generator who accumulates hazardous waste on-site for 90 days or less, and who does not meet the conditions for a license exemption of MAC R299.9306(1)-(2) [40 CFR § 262.34(a)], is an operator of a hazardous waste storage facility, and is required to obtain a hazardous waste storage license. See, MAC R299.9502(1), 299.9508, and 299.9510 [40 CFR §§ 270.1, 270.10, 270.13]. On failing to comply with the above-referenced conditions for a permit exemption, Apollo's failure to apply for and obtain a storage license violated these licensing requirements.

At this time, EPA is not requiring Apollo to apply for a storage license, so long as it immediately establishes compliance with the conditions for an exemption outlined above. According to Section 3008(a) of the Resource Conservation and Recovery Act (RCRA), U.S. EPA may issue an order assessing a civil penalty for any past or current violation requiring compliance immediately or within a specified time period. Although this letter is not such an order, we request that you submit a response in writing to this office no later than thirty (30) days after receipt of this letter. In addition, please note the following request for information pursuant to Section 3007 of RCRA:

Additional Information

USEPA has determined that additional information is necessary to determine the nature, extent and duration of the violations by Apollo at its Roseville facility. The specific information needed is identified below pursuant to Section 3007 of RCRA. The information must be provided notwithstanding its possible characterization as confidential information or trade secrets. Respondent is entitled to assert a claim of confidentiality pursuant to RCRA Section 3007(b) and 40 CFR § 2.203(b) for any information produced that, if disclosed to persons other than officers, employees, or duly authorized representatives of the United States, would divulge information entitled to protection as trade secrets. Any information which the Administrator of this Agency determines to constitute methods, processes or other business information entitled to protection as trade secrets will be maintained as confidential pursuant to the procedures set forth in 40 CFR Part 2. A request for confidential treatment must be made when information is provided since any information not so identified will not be accorded this protection by the Agency.

The written statements submitted pursuant to this request must be notarized and returned under an authorized signature certifying that all statements contained in them are true and accurate to the best of the signatory's knowledge and belief. Should the signatory find at any time after submission of the requested information that any portion of the information certified as true is false or misleading, the signatory should so notify USEPA. If any information submitted under this information request is found to be untrue or misleading, the signatory can be prosecuted under Section 101 of Title 18 of the United States Code. USEPA has the authority to use the information requested herein in an administrative, civil, or criminal action.

This Information Request is not subject to the Paperwork Reduction Act, See 44 U.S.C. Sections 3518(c)(1)(A) and (B).

1. Please provide the following information regarding Apollo's hazardous waste management at its facility located at 15765 Sturgeon Road, Roseville, Michigan 48066:

- a. State the specific efforts Apollo has taken, or plans to take, to correct the noncompliances and violations set forth in the Notice of Violation (NOV) above;
- b. State and provide documentation of all capital and operation and maintenance costs incurred to correct the violations set forth in the NOV above;
- c. If any of the violations set forth in the NOV are continuing, submit Apollo's plan for returning to compliance.

2. For each facility employee that received annual or initial hazardous waste training in 2002, provide the following information:


- a. State whether any type of hazardous waste training was provided to the employee at any time during 2003;
 - b. If hazardous waste training was provided to the employee in 2003, provide the date of the training;
 - c. Provide the name of the person(s) who provided the employee's hazardous waste training in 2003;
 - d. Provide a true and accurate copy of all records, including electronic records, in Apollo's control, that document or support the information provided in response to 2(a)-(c) above.
3. For each provider of hazardous waste training listed in response to items 2.c above, provide the following information:
- a. State whether the provider was trained in hazardous waste management procedures at the time that the provider trained the employee in hazardous waste management.

Next Steps

Two copies of the information requested herein must be provided, within thirty (30) calendar days following receipt of this request, to the U.S. EPA, Region 5, Enforcement and Compliance Assurance Branch (DE-9J), 77 West Jackson Boulevard, Chicago, Illinois 60604, Attention: Bryan Gangwisch: with an additional copy to Benedict Okwumabua, Michigan Department of Environmental Quality, Waste & Hazardous Materials Division, Southeast State Office Building, 38980 Seven Mile Road, Livonia, MI 48152-1006.

If you have any questions regarding the inspection report, the NOV, or the information requested, please contact Bryan Gangwisch of my staff, at (312) 886-0989.

Sincerely yours,



Paul Little, Chief
Compliance Section 2
Enforcement & Compliance Assurance Branch

Enclosure

cc: Benedict Okwumabua
Waste & Hazardous Materials Division
Michigan Department of Environmental Quality
38980 Seven Mile Road
Livonia, Michigan 48152-1006

Mark Daniels, MDEQ- Southeast District

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604-3590

MEMORANDUM

DATE: April 7, 2004

TO: Argyri Ioannou, - Environmental Manager
Apollo Plating, Inc.

FROM: Bryan Gangwisch, Environmental Scientist,
Waste, Pesticides and Toxics Division
Enforcement and Compliance Assurance Branch
Compliance Section #2

SUBJECT: Inspection Report for April 7, 2004, Compliance Evaluation Inspection of Apollo Plating, Inc., MID 052 035 425, a Large Quantity Generator located in Roseville, Michigan

A Compliance Evaluation Inspection (CEI) of the Apollo Plating, Inc., facility located at 15765 Sturgeon Road, Roseville, Michigan, was conducted on April 7, 2004. Present for this inspection were the following people:

Todd McNulty, Quality & Risk Manager	Apollo Plating, Inc.
Argyri Ioannou, Environmental Manager	Apollo Plating, Inc.
Mark Daniels, Environmental Quality Analyst	MDEQ
Bryan Gangwisch, Environmental Scientist	U.S. EPA

This facility which is located at 15765 Sturgeon Road was originally constructed in 1969. Apollo Plating, Inc., has performed operations throughout the entire existence of this facility. Apollo performs three types of plating processes and a nickel-stripping operation. Mr. McNulty stated that the legal ownership and operator has not changed and is still Jim Grimes Sr. This facility has always been used for the plating process. Presently this facility employs about 130 people and operates 3 manufacturing shifts, 24 hours per day. One of Apollo Plating's processes involve alkaline zinc plating over cold-rolled steel, nickel-chrome line over stainless and cold-rolled steel, and chrome flash over stainless steel. The main waste streams generated at Apollo consists of electroplating sludge from the wastewater treatment process (F006), and spent acid from the stripping operation (D002). Other waste streams generated are spent waste fluorescent bulbs and used oil which gets mixed with hazardous waste. Most of the waste streams are managed in 55 gallon containers, cubic yard bags, in a cubic yard box, and in a roll-off box. Mr.

McNulty stated that an annual decant of the tanks on the zinc line takes place and the waste is toted or drummed.

This facility consists of one building that is involved with the generation and storage of hazardous waste, along with universal waste (fluorescent light bulbs) and generated used oils. The make-up of the facility includes office space, general storage area, plating lines, and a wastewater treatment system.

A walk-through of the facility was conducted at this time.

The General Storage Area contained four (4) cubic yard bags, which were designated as a hazardous waste storage area for less than 90 days, as stated by Ms. Ioannou. Each bag was closed and labeled as "hazardous waste", "F006", and all the bags were marked with an accumulation date that was less than 90 days old from the date of this inspection. The oldest marked date was 2/24/04. The bags contained no free liquid, but were still contained on pallets. A spill control kit was nearby along with a telephone and a fire extinguisher.

At the wastewater treatment system, there was a cubic yard container (hopper) that contained the filter cake "F006" waste. Ms. Ioannou stated that at this satellite area, the container was filled and moved daily to a less than 90-day roll-off box outside. The container was labeled as "hazardous waste", and "F006". A lid that could be manually removed/replaced was present on the container (hopper). The wastewater is discharged to the Detroit Water and Sewerage Department pursuant to a permit that will expire on 3/1/08.

The Chemical Drum Storage Area, was also designated as a less than 90-day hazardous waste storage area, as stated by Ms. Ioannou. There were four (4) 55-gallon drums that contained waste resulting from the cleaning of the zinc line. One drum that was labeled as "hazardous waste", "D002", and was dated 1/20/04, was designated as a satellite accumulation area because it was not filled as stated by Ms. Ioannou. The satellite drum was closed at this time. The other three drums that were designated less than 90 day storage were labeled as "hazardous waste", "D002", and dated 3/20/04; 3/22/04; and 3/27/04. The three storage drums were closed at this time. The labels however were not easily inspected and aisle space was not sufficient. This storage area was situated upon an impervious surface with no cracks or gaps, and the three storage drums were elevated on pallets. There was no secondary containment for these drums that contained free liquid. A spill control kit was nearby along with a telephone and a fire extinguisher.

The third designated less than 90-day hazardous waste storage area, consisted of a Roll-Off Box (ROB) that was situated outside. The ROB was labeled as "hazardous waste", "F006", and was dated 4/2/04. Ms. Ioannou stated that the ROB that received the filter cake daily from the cubic yard container (hopper), was shipped out approximately once per month. A spill control kit was nearby along with a telephone and a fire extinguisher. This storage area contained no free liquids and the ROB was securely covered with a waterproof tarp. The ROB was also protected from weather and vandals at its outside position and the surface it was situated on was impervious with no cracks or gaps.

The General Storage Area had three (3) 55-gallon drums of used fluorescent bulbs that were not properly contained, and the drums did not have any labels or dates on them. Pictures were taken of these waste bulbs. Mr. McNulty stated that the waste bulbs get disposed about once per year and get recycled.

The facility possessed a public address system, internal alarm, adequate number of fire extinguishers, adequate number of spill control kits, and all supervisors carry Nextel phones.

A records review was conducted at this time.

Manifests are kept on-site for at least 3 years. The most recent manifests show that waste is sent to the following TSDF's: Dynecol, Inc., (MID074259565); and World Resources Company (PAD981038227). The manifests are signed by Dave Shove and Ms. Ioannou. The manifests all had the appropriate land disposal restrictions attached. Copies (generator and TSD) were being forwarded to the MDEQ in Lansing, Michigan.

Inspections of the 90-day hazardous waste storage areas are conducted on a weekly basis. Inspections are conducted by Ms. Ioannou. Apollo maintains inspection logs for at least three years.

Waste determinations are done through Dynecol in Michigan and World Resources in Pennsylvania, or by generator knowledge.

Personnel training for all employees involved in the production/waste handling process has been taking place. According to Ms. Ioannou, she formulates the policies and then trains employees by leading them on a thorough walkthrough of the waste handling procedures specific to Apollo. Apollo was ensuring that all employees are properly trained and thoroughly familiar with emergency procedures as stated by Ms. Ioannou, but there were no records or documentation of a training syllabus provided. Ms. Ioannou did possess an 8 hour refresher that was current, but had no other documentation that she was trained for RCRA management. The training is done by Ms. Ioannou.

The contingency plan contained the following information: emergency coordinators and telephone numbers, list of safety and spill control equipment, facility schematic, evacuation routes, response policy for fire, smoke, and telephone numbers for fire and police departments, hospital, and MDEQ. Arrangements and notifications had been made with local fire, police, and hospitals in case of any emergencies.

Apollo's practice of waste minimization is as follows: Mr. McNulty stated that Apollo does not have a written plan, but is very conscious in making every effort to minimize waste through using a water recycling system which in turns saves on chemicals.

The inspection was concluded at this time.

Documents received during this inspection are as follows:

- Facility schematic of the facility
- A copy of a letter confirming Apollo's wastewater discharge permit is current

Documents given to Apollo during this inspection are as follows:

- U.S. EPA Small Business Resources handout (compliance assistance)

Documents received since the date of this inspection (4/7/04) are as follows:

- None

Attachments:

- A MDEQ Large Quantity Generator (LQG) inspection checklist
- A photo log of the inspection consisting of the following four (4) photos:
 - picture # 1
 - picture # 2
 - picture # 3
 - picture # 4



GENERATOR INSPECTION FORM

Facility's Name Apollo Plating, Inc.

Part 3 Rules

Date 4/7/04 ID# MID 052 035 425

1994 PA 451

HAZARDOUS WASTE AND WASTE #	SOURCE	HOW MUCH
Waste filter press cake from F006	WWTs → Electroplating	ROB/month
Spent acid D002	Nitric acid (spent strip solvent)	

____ abbreviated

FACILITY COMPLIANCE REQUIRED IN ALL AREAS

NI - Not Inspected N/A - Not Applicable

WASTE DETERMINATION (Rule 302: 40 CFR 262.11)

YES NO

1. Determined if waste streams are hazardous waste? (Rule 302: 40 CFR 262.11)	GGR	<input checked="" type="checkbox"/>	NI N/A
a) copy of waste evaluation on-site 3 years? (Rule 307(1): 40 CFR 262.40(c))	GRR	<input checked="" type="checkbox"/>	NI N/A
b) re-evaluated waste when changes in materials or process? (Rule 302(3))	GGR	<input checked="" type="checkbox"/>	NI N/A
2. Did generator have written waste analysis plan if treating wastes on-site? (Rule 306(1)(d): 40 CFR 268.7(a)(5))	GPT	<input type="checkbox"/>	NI N/A

IDENTIFICATION NUMBER (Rule 303: 40 CFR 262.12)

3. Has the generator obtained an identification number? (Rule 303: 40 CFR 262.12)	GGR	<input checked="" type="checkbox"/>	NI N/A
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MANIFEST REQUIREMENTS (Rule 304: 40 CFR 262.20)

4. Copies of the manifest readily available for review & inspection? (Section 11138(1)(f))	GMR	<input checked="" type="checkbox"/>	NI N/A
5. Manifests kept for the past 3 years? (Rule 307(3): 40 CFR 262.40(a))	GRR	<input checked="" type="checkbox"/>	NI N/A
6. Manifests, prepared by the generator (Rule 304(1)(a): 40 CFR 262.20(a)), contain the following?	GMR	<input checked="" type="checkbox"/>	NI N/A
a) manifest document number. (Rule 304(2)(a): 40 CFR 262.20(a))	GMR	<input checked="" type="checkbox"/>	NI N/A
b) generator's name, address, phone & ID # (Rule 304(2)(b): 40 CFR 262.20(a))	GMR	<input checked="" type="checkbox"/>	NI N/A
c) name & ID # of the transporter. (Rule 304(2)(c): 40 CFR 262.20(a))	GMR	<input checked="" type="checkbox"/>	NI N/A
d) name, address & ID # of TSDF. (Rule 304(2)(d): 40 CFR 262.20(b)&(c))	GMR	<input checked="" type="checkbox"/>	NI N/A
e) DOT description of waste(s). (Rule 304(2)(e): 40 CFR 262.20(a))	GMR	<input checked="" type="checkbox"/>	NI N/A
f) quantity of waste, type & # of containers. (Rule 304(2)(f): 40 CFR 262.20(a))	GMR	<input checked="" type="checkbox"/>	NI N/A
g) hazardous waste number of the wastes. (Rule 304(2)(g): 40 CFR 262.20(a))	GMR	<input checked="" type="checkbox"/>	NI N/A
h) generator signature, initial transporter & date of acceptance? (Rule 304(4)(a)&(b): 40 CFR 262.23(a)(1)&(2))	GMR	<input checked="" type="checkbox"/>	NI N/A
7. Submitted copy of manifests to Director no later than 10 days after month shipment was made? (Rule 304(4)(d))	GMR	<input checked="" type="checkbox"/>	NI N/A
8. For out-of-state manifests, was copy of 3 rd signature manifest submitted to Director? (Rule 304(4)(f))	GMR	<input checked="" type="checkbox"/>	NI N/A
9. Is the transporter used properly registered &/or permitted under Act 138, Section (2)&(3)? (Rule 304(1)(c))	GPT	<input checked="" type="checkbox"/>	NI N/A

NOTE: For shipments of hazardous waste solely by water or rail shipments, within United States see Rule 304(4)(g or h).

10. Using manifest that has expired? (Rule 304(2)(i): 40 CFR 262.20(a))	GMR	<input checked="" type="checkbox"/>	NI N/A
11. Reportable exceptions. (Rule 308(3): 40 CFR 262.42))			
a) number of manifests generator HASN'T receive signed copy from TSD w/in 35 days:	GRR	0	
b) number of manifests generator HASN'T submitted exception reports to RA & DEQ after 45 days:	GRR	0	
12. Facility has written program to reduce volume/toxicity/recycle wastes? (Rule 304(2)(i): 40 CFR 262.20(a))	GMR	<input checked="" type="checkbox"/>	NI N/A

OR

13. Facility discusses program in place to reduce volume/toxicity/recycle of waste (Rule 304(2)(i): 40 CFR 262.20(a))	GMR	<input checked="" type="checkbox"/>	NI N/A
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LAND DISPOSAL RESTRICTION REQUIREMENTS
WASTE ANALYSIS AND RECORDKEEPING (Rule 311(1): 40 CFR 268.7))

YES NO

14. Did the generator determine if the waste is restricted from land disposal? (Rule 311(1): 40 CFR 268.7(a)(1))		
a) all listed waste	GLB	<input checked="" type="checkbox"/> NI N/A
b) all characteristic wastes?	GLB	<input checked="" type="checkbox"/> NI N/A

NOTE: If waste has both listed & characteristic waste codes, the treatment standard for the listed waste is sufficient if the treatment standards for the listed waste includes a standard for the constituent that caused the waste to exhibit the characteristic, except for D001 and D002. (40 CFR 268.9(b))

15. If restricted waste exceeds treatment standards or prohibitions did notice go w/ initial shipment? (Rule 311(1):40 CFR 268.7(a)(2))	GLB	<input checked="" type="checkbox"/> NI N/A
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OR

16. If restricted waste does not exceed treatment standards or prohibitions did a notice and certification statement go with initial shipment? (Rule 311(1): (40 CFR 268.7(a)(3))	GLB	<input type="checkbox"/> NI N/A
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OR

17. If waste has exemption from prohibition on the type of land disposal method utilized for the waste, did a notice go with initial shipment? (Rule 311(1): 40 CFR 268.7(a)(4))	GLB	<input type="checkbox"/> NI N/A
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OR

18. If facility choose alternative treatment standard for lab pack that contains none of the waste in appendix IV, did a notice & certification go with initial shipment? (Rule 311(1): 40 CFR 268.7(a)(9))	GLB	<input type="checkbox"/> NI N/A
19. Did the notice include: (Rule 311(1): 40 CFR 268.7(a)(1) or 268.7(a)(2) or 268.7(a)(3))		
a) EPA hazardous waste #?	GLB	<input checked="" type="checkbox"/> NI N/A
b) if wastewater or non-wastewater as defined in 268.2(d&f)?	GLB	<input checked="" type="checkbox"/> NI N/A
c) subcategory of the waste (such as D003 reactive cyanide) if applicable?	GLB	<input checked="" type="checkbox"/> NI N/A
d) manifest number associated with the shipment?	GLB	<input checked="" type="checkbox"/> NI N/A
e) waste analysis data, where available?	GLB	<input checked="" type="checkbox"/> NI N/A
f) waste constituents that the treater will monitor, if monitoring will not include all regulated constituents, for F001- F005, F039, D001, D002, D012-D043? (treatment standards for hazardous waste in table in 268.40 for the waste code under regulated constituents)	GLB	<input checked="" type="checkbox"/> NI N/A

UNLESS

g) did generator/treater claim they are going to monitor for ALL regulated constituents in the waste in lieu of the generator indicating same in the notice? (Rule 311(1): 40 CFR 268.7(a)(1) & 268.9)	GLB	<input type="checkbox"/> NI N/A
h) did generator/treater claim they are going to monitor for underlying hazardous waste constituents (except vanadium and zinc), reasonably expected to be present at the generation point, above UTS standards for D001, D002 & TCLP organics? (Rule 311(1): 40 CFR 268 Subpart D & 268.48)	GLB	<input type="checkbox"/> NI N/A
20. Other than notices for waste exceeding treatment standards, did notices include: (Rule 311(1): 40 CFR 268.7(2)(3))		
a) if the notice is for shipments that meet the standards does the notice include the certification?	GLB	<input type="checkbox"/> NI N/A
b) if the notice is for shipments under prohibitions does the notice include a statement that the waste isn't prohibited from land disposal & date the waste is subject to prohibition?	GLB	<input type="checkbox"/> NI N/A

NOTE: An alternate treatment standard may be used after approval from the Administrator. (40 CFR 268.44)

NOTE: Hazardous waste debris see 40 CFR 268.7(a)(1)(iv) for the notice requirements which must be followed by the statement "This hazardous debris is subject to alternative treatment standards of 40 CFR 268.45."

21. Generator retain on-site records to support determination from knowledge or results from tests? (40 CFR 268.7(a)(6))	GLB	<input checked="" type="checkbox"/> NI N/A
22. If the restricted waste is excluded from being a hazardous waste or solid waste did the generator place a one- time notice stating same in the facility file? (40 CFR 268.7(a)(7))	GLB	<input type="checkbox"/> NI N/A
23. All notices/certifications/demonstrations/other documents retained for 3 years on-site? (40 CFR 268.7(a)(8)).	GLB	<input checked="" type="checkbox"/> NI N/A

NOTE: This requirement (268.7(a)(8)) applies to solid waste even when the hazardous waste characteristic is removed prior to disposal or when the waste is excluded from the definition of hazardous waste or solid waste.

DILUTION PROHIBITED AS SUBSTITUTE FOR TREATMENT (RULE 311(1):40 CFR 268.3)

24. Generator dilute hazardous waste or treatment residue of a hazardous waste to avoid prohibition? (40 CFR: 268.3(a))	GLB	<input checked="" type="checkbox"/> NI N/A
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TREATMENT STANDARDS (RULE 311(1):40 CFR 268.40)

25. If wastes exceeding treatment standards are mixed, was the most stringent standards selected? (40 CFR 268.40(c))	GLB	<input checked="" type="checkbox"/> NI N/A
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BIENNIAL REPORT (Rule 308: 40 CFR 262.41)

YES NO

26. Generator submitted biennial report by 3/1 (even years)? (Rule 308(1): 40 CFR 262.41)	GRR	<input checked="" type="checkbox"/>	NI N/A
27. Were copies of the report retained at least 3 years? (Rule 307(4): 40 CFR 262.40(b))	GRR	<input checked="" type="checkbox"/>	NI N/A

PRE-TRANSPORTER REQUIREMENTS (Rule 305: 40 CFR 262.30)

28. Waste packaged according to DOT regulations (required before shipping waste off-site)? (Rule 305(1)(a): 40 CFR 262.30)	GPT	<input checked="" type="checkbox"/>	NI N/A
29. Are waste packages marked & labeled according to DOT concerning hazardous materials (required before shipping waste off-site)? (Rule 305(1)(b)(c): 40 CFR 262.32(a))	GPT	<input checked="" type="checkbox"/>	NI N/A
30. On containers 110 gallons or less, is there a warning, generator's name, address, manifest document # & waste code; 49 CFR 172.304? (Rule 305(1)(d): 40 CFR 262.32(b))	GPT	<input checked="" type="checkbox"/>	NI N/A
31. If required (>1000 #'s), are placards available to the transporter? (Rule 305(1)(e): 40 CFR 262.33)	GPT	<input checked="" type="checkbox"/>	NI N/A

ACCUMULATION TIME (Rule 306: 40 CFR 262.34)

32. If hazardous waste accumulated in containers: (If no, skip to #35)			
a) containers have accumulation date & visible? (Rule 306(1)(b): 40 CFR 262.34(a)(2))	GPT	<input checked="" type="checkbox"/>	NI N/A
b) container have words "Hazardous Waste"? (Rule 306(1)(c): 40 CFR 262.34(a)(3))	GPT	<input checked="" type="checkbox"/>	NI N/A
c) is each container clearly marked with the hazardous waste number? (Rule 306(1)(b))	GPT	<input checked="" type="checkbox"/>	NI N/A
d) has more than 90 days elapsed since date marked? (Rule 306(1))	GPT	<input checked="" type="checkbox"/>	NI N/A

UNLESS

e) the generator applied for & received an extension to accumulate longer? (Rule 306(3): 40 CFR 262.34(b))	GPT	<input type="checkbox"/>	NI (N/A)
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The following Subpart I, 265.170 to 265.177 requirements are referred to by Rule 306(1)(a) and 40 CFR 262.34(a)(1).

f) are containers in good condition? (265.171)	GPT	<input checked="" type="checkbox"/>	NI N/A
g) are containers compatible with waste in them (265.172)	GPT	<input checked="" type="checkbox"/>	NI N/A
h) are containers stored closed? (265.173(a))	GPT	<input checked="" type="checkbox"/>	NI N/A
i) containers handled/stored in a way which may rupture it or cause leaks? (265.173(b))	GPT	<input checked="" type="checkbox"/>	NI N/A
j) ignitable & reactive wastes stored 15 meters (50 feet) from property line? (265.176)	GPT	<input type="checkbox"/>	NI (N/A)
k) are containers inspected weekly for leaks and defects? (265.174)	GPT	<input checked="" type="checkbox"/>	NI N/A
l) did the generator document the inspections in 32(k)? (Rule 306(1)(a)(i))	GPT	<input checked="" type="checkbox"/>	NI N/A
m) inspection documents maintained on-site 3 years? (Rule 306(1)(a)(i))	GPT	<input checked="" type="checkbox"/>	NI N/A
n) are incompatible wastes stored in separate containers? (265.177(a))	GPT	<input type="checkbox"/>	NI (N/A)
o) hazardous wastes put in unwashed containers that previously held incompatible waste. (265.177(b))	GPT	<input type="checkbox"/>	NI (N/A)
p) incompatible waste separated/protected from each other by physical barriers or sufficient distance? (265.177(c))	GPT	<input type="checkbox"/>	NI (N/A)

Rule 306(2) & 40 CFR 262.34(c)(1)(i) both refer to 40 CFR 265.171, 265.172 & 265.173(a).

33. If hazardous waste is being accumulated at the point of generation:			
a) container(s) <55 gal or 1 qt acutely/severely toxic? (Rule 306(2): 40 CFR 262.34(c)(1))	GPT	<input checked="" type="checkbox"/>	NI N/A
b) container(s) under operator control & near the point of generation? (Rule 306(2): 40 CFR 262.34(c)(1))	GPT	<input checked="" type="checkbox"/>	NI N/A
c) container(s) have words "Hazardous Waste"? (Rule 306(2): 40 CFR 262.34(c)(1)(ii))	GPT	<input checked="" type="checkbox"/>	NI N/A
d) are the container(s) marked with the hazardous waste number or chemical name? (Rule 306(2))	GPT	<input checked="" type="checkbox"/>	NI N/A
e) are container(s) in good condition? (265.171)	GPT	<input checked="" type="checkbox"/>	NI N/A
f) are container(s) compatible with waste in them? (265.172)	GPT	<input checked="" type="checkbox"/>	NI N/A
g) container(s) closed when not in use & managed to prevent leaks? (265.173(a))	GPT	<input checked="" type="checkbox"/>	NI N/A
34. If generator exceeds 55 gallons or 1 quart, w/in 3 days does generator, w/respect to that amount of excess waste:			
a) mark the container with the date the excess amount began accumulating? (Rule 306(2): 40 CFR 262.34(c)(2))	GPT	<input checked="" type="checkbox"/>	NI N/A
b) move to an area with secondary containment?	GPT	<input type="checkbox"/>	NI N/A

Rule 306(1)(a) refers to containment requirements in 40 CFR 264.175.

35. If accumulating free liquids or any F020, F021, F022, F023, F026, F027, does the hazardous waste storage area include			
a) impervious base free of cracks? (264.175(b)(1)):	GPT	<input checked="" type="checkbox"/>	NI N/A

		YES	NO
b) sloped or otherwise designed to elevate/protect containers from contact with liquids? (264.175(b)(2))	GPT	<input checked="" type="checkbox"/>	NI N/A
c) hold 10% of volume of containers or volume of the largest container, whichever is greater? (264.175(b)(3))	GPT	<input type="checkbox"/> <input checked="" type="checkbox"/>	NI N/A
d) run-on prevented unless sufficient capacity? (264.175(b)(4))	GPT	<input checked="" type="checkbox"/>	NI N/A
e) accumulated liquids removed in a timely manner to prevent overflow? (264.175(b)(5))	GPT	<input checked="" type="checkbox"/>	NI N/A

NOTE: Closure of Accumulation Area covered under # 53.

36. If accumulating solids, (other than F020, F021, F022, F023, F026, F027), is haz waste accumulation area sloped or otherwise designed, or containers elevated or otherwise protected from contact with liquids? (264.175(c)(1 & 2))	GPT	<input checked="" type="checkbox"/>	NI N/A
37. Is hazardous waste accumulated in other than tanks or containers? Or, is hazardous waste generated but not accumulated, i.e.: process tank? <i>Explain any yes answer. Dry Food bags</i>		<input checked="" type="checkbox"/>	NI N/A
38. Waste area protected from weather, fire, physical damage & vandals? (Rule 306(1)(e))	GPT	<input checked="" type="checkbox"/>	NI N/A
39. Hazardous waste accumulated so no hazardous waste or hazardous waste constituent can escape by gravity into soil, directly or indirectly, into surface, ground-waters, drains or sewers, and such that fugitive emissions do not violate Act 451, Part 55? (Rule 306(1)(f))	GPT	<input checked="" type="checkbox"/>	NI N/A
40. Is hazardous waste accumulated in tanks? <i>If so, complete Tank System inspection form.</i>		<input checked="" type="checkbox"/>	NI N/A
41. Is hazardous waste placed on drip pads? <i>If so, complete Wood Preserving inspection form</i>		<input checked="" type="checkbox"/>	NI N/A

Rule 306(1)(d) & 40 CFR 262.34(a)(4) refers to 265.16
PERSONNEL TRAINING (265.16)

42. Did personnel receive training? (265.16)	GPT	<input checked="" type="checkbox"/>	NI N/A
43. Do personnel training records contain the following:			
a) job title? (265.16(d)(1))	GPT	<input type="checkbox"/> <input checked="" type="checkbox"/>	NI N/A
b) job descriptions? (265.16(d)(2))	GPT	<input type="checkbox"/> <input checked="" type="checkbox"/>	NI N/A
c) name of employee filling each job? (265.16(d)(1))	GPT	<input type="checkbox"/> <input checked="" type="checkbox"/>	NI N/A
d) description of type & amount of both introductory & continued training? 265.16(d)(3))	GPT	<input type="checkbox"/> <input checked="" type="checkbox"/>	NI N/A
e) training designed so facility personnel can respond to emergencies? (265.16(a)(3))	GPT	<input checked="" type="checkbox"/>	NI N/A
f) records of training? (265.16(d)(4))	GPT	<input type="checkbox"/> <input checked="" type="checkbox"/>	NI N/A
g) do new personnel receive required training within 6 months? (265.16(b))	GPT	<input checked="" type="checkbox"/>	NI N/A
h) do training records show personnel have taken part in annual training? (265.16(c))	GPT	<input type="checkbox"/> <input checked="" type="checkbox"/>	NI N/A
i) training by person trained in hazardous waste management procedures? (265.16(a))	GPT	<input checked="" type="checkbox"/>	NI N/A

Rule 306(1)(d) & 40 CFR 262.34(a)(4) refer to 265, Subpart C, 265.30-265.37.
PREPAREDNESS AND PREVENTION (265.30-265.37)

44. Facility maintained/operated to minimize possibility of fire, explosion, release of hazardous waste or hazardous waste constituent which could threaten human health/environment? (265.31)	GPT	co.said_obsrved_ <input checked="" type="checkbox"/>	NI N/A
45. If required, does this facility have the following::			
a) internal communications or alarm systems? (265.32(a))	GPT	<input checked="" type="checkbox"/>	NI N/A
b) telephone or 2-way radios at the scene of operations? (265.32(b))	GPT	<input checked="" type="checkbox"/>	NI N/A
c) portable fire extinguishers, fire control, spill control equipment and decontamination equipment? (265.32(c))	GPT	<input checked="" type="checkbox"/>	NI N/A
d) adequate volume of water and/or foam available for fire control? (265.32(d))	GPT	<input checked="" type="checkbox"/>	NI N/A
46. Testing and Maintenance of Emergency Equipment			
a) owner/operator test & maintain emergency equipment to assure operation? (265.33)	GPT	<input checked="" type="checkbox"/>	NI N/A
b) has owner/operator provided immediate access to internal alarms? Access to alarm system is applicable only if required (40 CFR 265.32)			
i) when hazardous waste is being poured, mixed, etc. (265.34(a))	GPT	<input type="checkbox"/>	NI N/A
ii) one employee on the premises while facility is operating. (265.34(b))	GPT	<input checked="" type="checkbox"/>	NI N/A
c) aisle space for unobstructed movement of personnel/emergency equipment? (265.35)	GPT	<input type="checkbox"/> <input checked="" type="checkbox"/>	NI N/A
47. Has the facility made arrangements with local authorities? (265.37(a)&(b))	GPT	<input checked="" type="checkbox"/>	NI N/A

Rule 306(1)(d) & 40 CFR 262.34(a)(4) refer to Subpart D, 265.50-265.56.
CONTINGENCY PLAN AND EMERGENCY PROCEDURES (265.50-265.56)

		YES	NO
48. Plan implemented whenever fire/explosion/release could threaten human health or the environment? (265.51(b))	GPT	<input checked="" type="checkbox"/>	NI N/A
49. Does the contingency plan contain the following:			
a) actions personnel must take responding to fires/explosions/unplanned release of hazardous waste? (265.52(a & b))	GPT	<input checked="" type="checkbox"/>	NI N/A
b) describe arrangements w/ local police, fire, hospitals, contractors, state & local emergency responders for emergency services; (265.52(c)) & (265.37(a)&(b))?	GPT	<input checked="" type="checkbox"/>	NI N/A
c) name, addresses & phone (office & home) of emergency coordinator? (265.52)(d))	GPT	<input checked="" type="checkbox"/>	NI N/A
d) list emergency equipment at the facility, including location, physical description & capabilities? (265.52(e))	GPT	<input checked="" type="checkbox"/>	NI N/A
e) evacuation plan for personnel w/ signal(s), evacuation routes & alternate evacuation routes. (265.52(f))	GPT	<input checked="" type="checkbox"/>	NI N/A
50. Does the facility have an Emergency Coordinator? (265.55)	GPT	<input checked="" type="checkbox"/>	NI N/A
Emergency Coordinator and Emergency Procedures:			
a) emergency coordinator familiar with site operation & emergency procedures? (265.55)	GPT	<input checked="" type="checkbox"/>	NI N/A
b) emergency coordinator has the authority to carry out the contingency plan? (265.55)	GPT	<input checked="" type="checkbox"/>	NI N/A
c) if emergency occurred, did the emergency coordinator follow emergency procedures? (265.56)	GPT	<input type="checkbox"/>	NI <input checked="" type="radio"/> N/A
d) fire/explosion/other release of hazardous waste/haz. waste constituents, could threaten human health or environment or generator has knowledge spill reached surface or ground water, did generator notify MDEQ? (Rule 306(1)(d))	GPT	<input type="checkbox"/>	NI <input checked="" type="radio"/> N/A
51. Contingency plan Amendments and Copies			
a) amended: fails in emergency; changes in regulations/emergency coordinators/emergency equipment? (265.54)	GPT	<input type="checkbox"/>	NI <input checked="" type="radio"/> N/A
b) copies of plan on site and sent to local emergency organizations? (265.53)	GPT	<input checked="" type="checkbox"/>	NI N/A

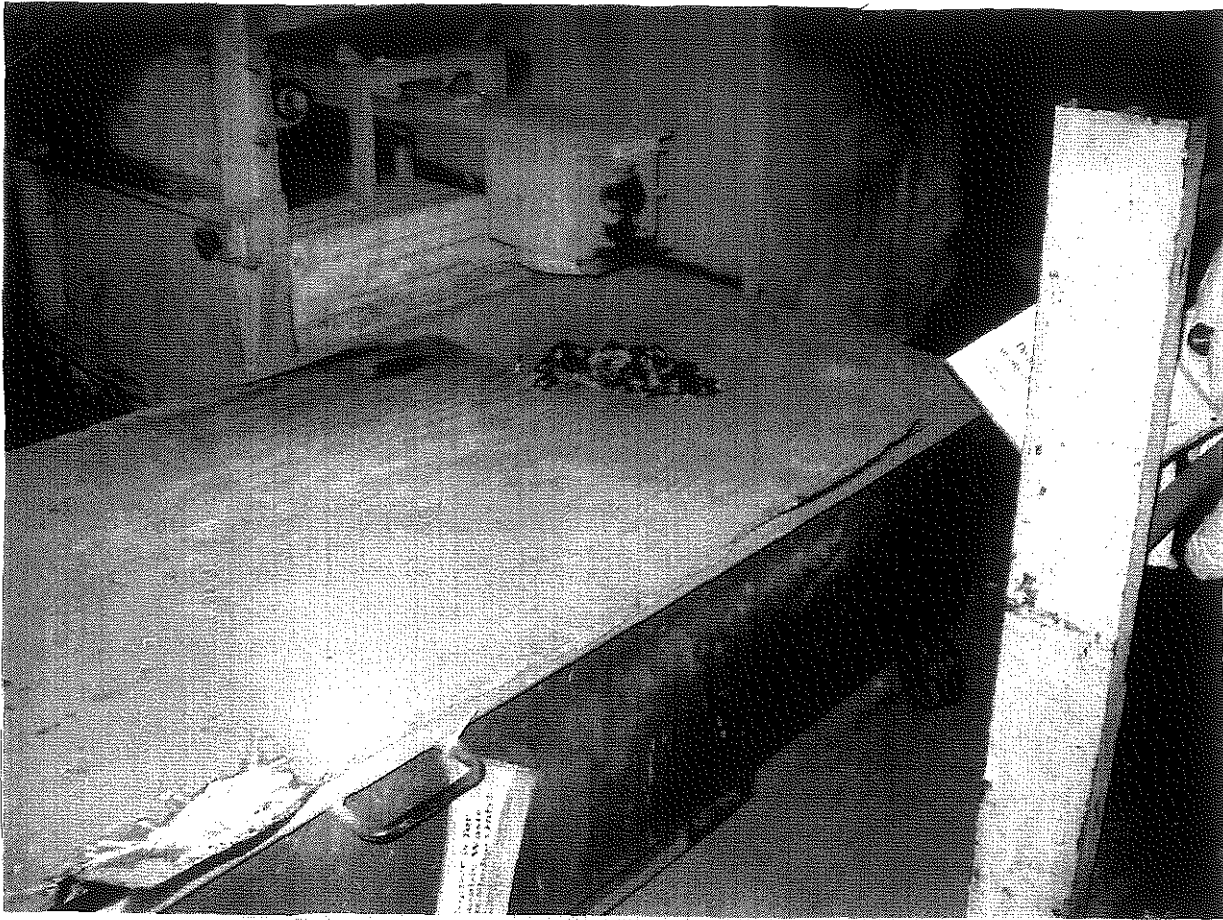
Rule 309 refers to 262, Subpart E except 262.54 & 262.55
INTERNATIONAL SHIPMENTS (Rule 309 & 310: 40 CFR 262.50-262.60)

52. Has the facility imported or exported hazardous waste?	GEX		NI <input checked="" type="radio"/> N/A
a) exporting, has the generator:			
i) notified the Administrator in writing <12 months prior to shipment? (Rule 309(1): 40 CFR 262.53(a))	GEX	<input type="checkbox"/>	NI <input checked="" type="radio"/> N/A
ii) receiving country consented to accept waste. (Rule 309(1): 40 CFR 262.52(b))	GEX	<input type="checkbox"/>	NI <input checked="" type="radio"/> N/A
iii) has copy of EPA Acknowledgment of Consent. (Rule 309(1): 40 CFR 262.52(c))	GEX	<input type="checkbox"/>	NI <input checked="" type="radio"/> N/A
iv) complied with manifest requirements in Rule 309(2)(a-i).	GEX	<input type="checkbox"/>	NI <input checked="" type="radio"/> N/A
v) if required, was an exception report filled. (309(3)(a-c))	GEX	<input type="checkbox"/>	NI <input checked="" type="radio"/> N/A
b) importing, has the generator met manifest requirements? (Rule 310: 40 CFR 262.60)	GIX	<input type="checkbox"/>	NI <input checked="" type="radio"/> N/A

Rule 306(1)(g) and 40 CFR 262.34(a)(1) refers to 40 CFR 265.111 & 265.114
ACCUMULATION AREA CLOSURE (265.111 & 265.114)

53. The accumulation area must be closed in a manner that:			
a) minimizes need for further maintenance (Rule 306(1)(g): 40 CFR 265.111(a))	GPT	<input type="checkbox"/>	NI <input checked="" type="radio"/> N/A
b) controls/minimizes/eliminates, to protect human health & environment, the escape of haz. waste or haz. waste constituents, leachate, run-off to ground/surface waters and air. (Rule 306(1)(g): 40 CFR 265.111(b))	GPT	<input type="checkbox"/>	NI <input checked="" type="radio"/> N/A
c) all contaminated equipment, structures, and soil properly disposed of. (Rule 306(1)(g): 40 CFR 265.114)	GPT	<input type="checkbox"/>	NI <input checked="" type="radio"/> N/A

COMMENTS:



1. A cubic yard hazardous waste satellite container (hopper) that contained F006 filter cake, the container had a waste code, was labeled as "hazardous waste", and was dated

Apollo Plating, Roseville, MI
Bryan Gangwisch, USEPA

4/7/04



2. 55-gallon hazardous waste storage containers that contained D002 waste from cleaning of the zinc line had waste codes, were closed, labeled as “hazardous waste”, but labels were not visible for inspection

Apollo Plating, Roseville, MI
Bryan Gangwisch, USEPA

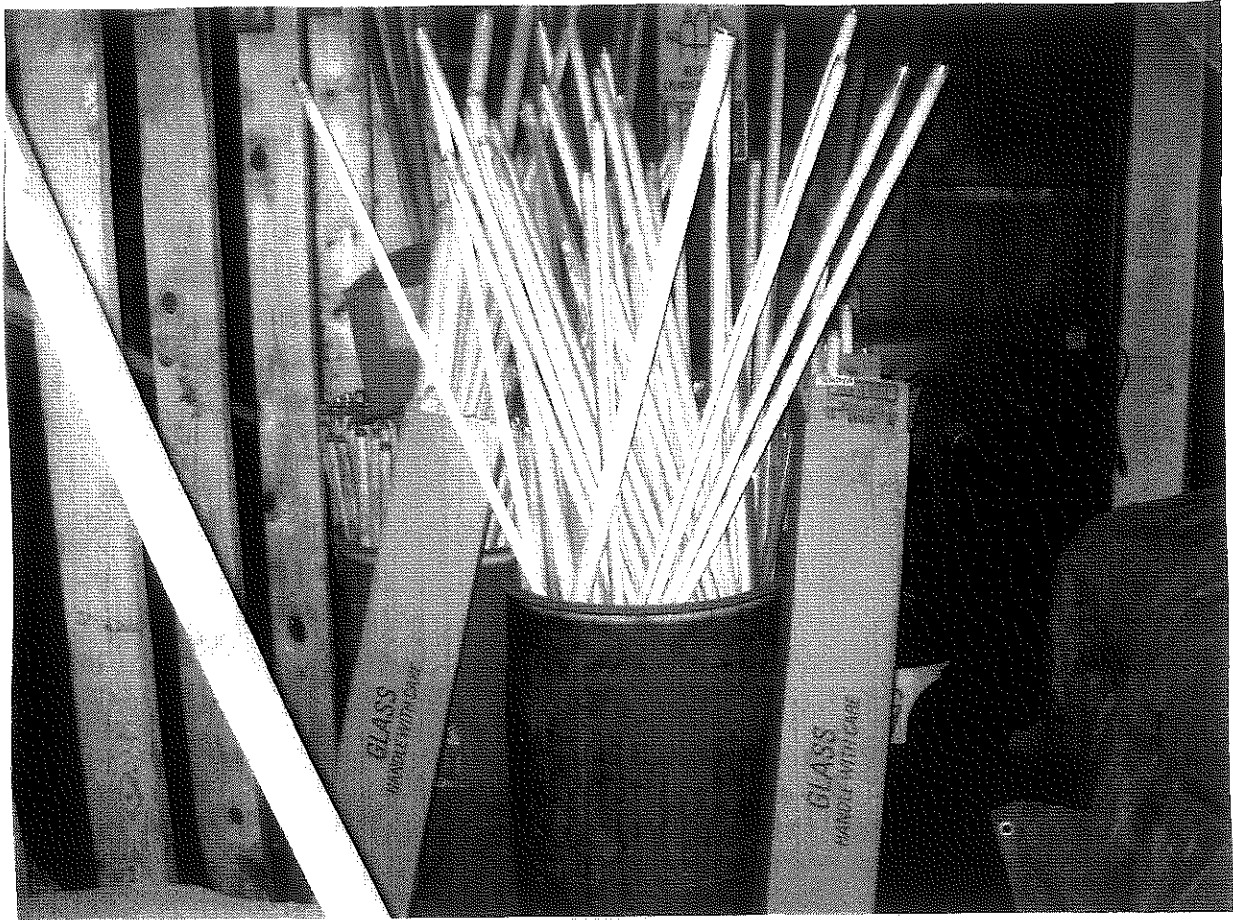
4/7/04



3. The same hazardous waste storage containers as the previous photo (2.), aisle space is insufficient and no secondary containment available (free liquids)

Apollo Plating, Roseville, MI
Bryan Gangwisch, USEPA

4/7/04



4. Three 55-gallon containers holding used waste fluorescent bulbs, not labeled, or dated, and not contained properly

Apollo Plating, Roseville, MI
Bryan Gangwisch, USEPA 4/7/04



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF

JUN 07 2004

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

DE-9J

Argyri Ioannou, Environmental Manager
Apollo Plating, Inc.
15765 Sturgeon Road
Roseville, Michigan 48066

Re: Notice Of Violation
Apollo, Roseville, Michigan
EPA ID No.: MID 052 035 425

Dear Ms. Ioannou:

On April 7, 2004, a representative of the United States Environmental Protection Agency (U.S. EPA) and a representative of the Michigan Department of Environmental Quality (MDEQ) inspected Apollo Plating, Inc., located in Roseville, Michigan. The purpose of the inspection was to evaluate Apollo's compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA); specifically, those regulations related to the generation, treatment and storage of hazardous waste. Please find enclosed a copy of the inspection report for your reference.

Based on information provided by Apollo personnel, review of records, and physical observations by the inspectors, U.S. EPA finds that Apollo is engaged in the management of hazardous waste without a hazardous waste storage license, and is in violation of the requirements of the Michigan Administrative Code and the United States Code of Federal Regulation (CFR). To be eligible for the exemption from having a hazardous waste storage license, Apollo must be in compliance with the conditions of Michigan Administrative Code R299.9306 [40 CFR § 262.34]. Specifically, we find that Apollo is in noncompliance with the following conditions for a storage license exemption, and in violation of the following requirements:

1. In order to avoid the need for a hazardous waste storage license, a large quantity generator must clearly mark and make visible for inspection on its hazardous waste containers the date upon which each period of accumulation begins, and the hazardous waste number of the waste. See, Michigan Administrative Code, R299.9306(1)(b); 299.9502(1) [40 CFR § 262.34(a)(2), and (3); 270.1(c) and 270.10(a) & (d)].

During the inspection of the hazardous waste storage area consisting of three (3) containers that were storing D002 waste from the cleaning of the zinc line, the hazardous waste containers were stored in such a manner that the labels were not visible for inspection. Apollo therefore failed to comply with the above-mentioned condition for a storage license exemption.

2. In order to avoid the need for a hazardous waste storage license, a large quantity generator must maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency, unless aisle space is not needed for any of these purposes. See, MAC R299.9306(1)(d), 40 CFR § 265.35 [40 CFR § 262.34(a)(4)]. This is also a requirement for owners and operators of hazardous waste storage facilities, under 40 CFR § 265.35 and MAC R299.9601(3).

During the inspection of the same hazardous waste storage area as mentioned above, the aisle space between the containers storing the D002 waste was insufficient. Pallets of empty containers/containers with parts were stored directly next to the hazardous waste storage area. Also, the hazardous waste storage drums were right up against the perimeter wall of the facility, as passage was not possible to inspect all of the labels. Apollo therefore has failed to comply with the above-referenced conditions for a license exemption, and has violated the storage facility aisle space requirements.

3. In order to avoid the need for a hazardous waste storage license, a large quantity generator must provide a containment system that has sufficient capacity to contain 10% of the volume (free liquids) of containers or the volume of the largest container, whichever is greater. See, MAC R299.9306(1)(a)(i), 40 CFR § 264.175(b)(3). This is also a requirement for owners and operators of hazardous waste storage facilities, under MAC R299.9601(2)(g) and R299.9614(1)(a).

During the inspection of the same hazardous waste storage area as mentioned above, the hazardous waste (D002) storage containers were elevated on pallets, however there was no containment system to sufficiently contain any potential leak, discharge, or spill. Apollo therefore has failed to comply with the above-referenced conditions for a license exemption, and has violated the storage facility containment system requirements.

4. In order to avoid the need for a hazardous waste storage license, a large quantity generator must ensure that facility personnel with hazardous waste management responsibilities successfully complete an initial training program which includes all the elements of 40 CFR § 265.16(d) and is directed by a person trained in hazardous waste management procedures; and receive review training annually thereafter. See, MAC R299.9306(1)(d), 40 CFR § 265.16(a)-(c) [40 CFR § 262.34(a)(4)]. This is also required of owners and operators of hazardous waste storage facilities, under MAC R299.9601(3)(b), 40 CFR § 265.16(a)-(c), MAC R299.9605(1), and 40 CFR §§ 264.16(a)-(c).

During the inspection of records, Apollo personnel stated that employees are properly trained and thoroughly familiar with waste handling procedures specific to this facility, but there were no records or documentation of a training syllabus provided and no other documentation was provided in lieu of a RCRA component. Therefore, Apollo has failed to comply with the above-referenced conditions for a license exemption, and has violated the storage facility training requirements.

5. A universal waste small quantity handler shall manage used electric lamps in a manner that prevents breakage or the release of any universal waste or components of universal waste by containing unbroken lamps in structurally sound packaging that is compatible with the contents of the lamps and will prevent breakage during normal handling conditions. The packaging shall remain closed and lack evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions. Also, the lamps or packaging in which the lamps are contained shall be labeled with the words "universal waste electric lamps", "waste electric lamps", or "used electric lamps." A small quantity handler of universal waste who accumulates universal waste must be able to demonstrate the length of time that the universal waste has been accumulated from the date it becomes a waste or is received. See, MAC R299.9228(4)(c)(ii), 299.9228(4)(c)(iv), and 299.9228(4)(a) [40 CFR § 273.13(d); 273.14(e); and 273.15(c)].

During the inspection of the general floor operations, there were waste electric lamps stored in three 55-gallon containers. The waste lamps were not properly contained to prevent breakage, not dated, or labeled with the words "waste electric lamps." Therefore, Apollo has violated the small quantity handler requirement for properly containing waste lamps.

6. A large quantity generator who accumulates hazardous waste on-site for 90 days or less, and who does not meet the conditions for a license exemption of MAC R299.9306(1)-(2) [40 CFR § 262.34(a)], is an operator of a hazardous waste storage facility, and is required to obtain a hazardous waste storage license. See, MAC R299.9502(1), 299.9508, and 299.9510 [40 CFR §§ 270.1, 270.10, 270.13]. On failing to comply with the above-referenced conditions for a permit exemption, Apollo's failure to apply for and obtain a storage license violated these licensing requirements.

At this time, EPA is not requiring Apollo to apply for a storage license, so long as it immediately establishes compliance with the conditions for an exemption outlined above. According to Section 3008(a) of the Resource Conservation and Recovery Act (RCRA), U.S. EPA may issue an order assessing a civil penalty for any past or current violation requiring compliance immediately or within a specified time period. Although this letter is not such an order, we request that you submit a response in writing to this office no later than thirty (30) days after receipt of this letter. In addition, please note the following request for information pursuant to Section 3007 of RCRA:

Additional Information

USEPA has determined that additional information is necessary to determine the nature, extent and duration of the violations by Apollo at its Roseville facility. The specific information needed is identified below pursuant to Section 3007 of RCRA. The information must be provided notwithstanding its possible characterization as confidential information or trade secrets.

Respondent is entitled to assert a claim of confidentiality pursuant to RCRA Section 3007(b) and 40 CFR § 2.203(b) for any information produced that, if disclosed to persons other than officers, employees, or duly authorized representatives of the United States, would divulge information entitled to protection as trade secrets. Any information which the Administrator of this Agency determines to constitute methods, processes or other business information entitled to protection as trade secrets will be maintained as confidential pursuant to the procedures set forth in 40 CFR Part 2. A request for confidential treatment must be made when information is provided since any information not so identified will not be accorded this protection by the Agency.

The written statements submitted pursuant to this request must be notarized and returned under an authorized signature certifying that all statements contained in them are true and accurate to the best of the signatory's knowledge and belief. Should the signatory find at any time after submission of the requested information that any portion of the information certified as true is false or misleading, the signatory should so notify USEPA. If any information submitted under this information request is found to be untrue or misleading, the signatory can be prosecuted under Section 101 of Title 18 of the United States Code. USEPA has the authority to use the information requested herein in an administrative, civil, or criminal action.

This Information Request is not subject to the Paperwork Reduction Act, See 44 U.S.C. Sections 3518(c)(1)(A) and (B).

1. Please provide the following information regarding Apollo's hazardous waste management at its facility located at 15765 Sturgeon Road, Roseville, Michigan 48066:

- a. State the specific efforts Apollo has taken, or plans to take, to correct the noncompliances and violations set forth in the Notice of Violation (NOV) above;
- b. State and provide documentation of all capital and operation and maintenance costs incurred to correct the violations set forth in the NOV above;
- c. If any of the violations set forth in the NOV are continuing, submit Apollo's plan for returning to compliance.

2. For each facility employee that received annual or initial hazardous waste training in 2002, provide the following information:

- a. State whether any type of hazardous waste training was provided to the employee at any time during 2003;
 - b. If hazardous waste training was provided to the employee in 2003, provide the date of the training;
 - c. Provide the name of the person(s) who provided the employee's hazardous waste training in 2003;
 - d. Provide a true and accurate copy of all records, including electronic records, in Apollo's control, that document or support the information provided in response to 2(a)-(c) above.
3. For each provider of hazardous waste training listed in response to items 2.c above, provide the following information:
- a. State whether the provider was trained in hazardous waste management procedures at the time that the provider trained the employee in hazardous waste management.

Next Steps

Two copies of the information requested herein must be provided, within thirty (30) calendar days following receipt of this request, to the U.S. EPA, Region 5, Enforcement and Compliance Assurance Branch (DE-9J), 77 West Jackson Boulevard, Chicago, Illinois 60604, Attention: Bryan Gangwisch; with an additional copy to Benedict Okwumabua, Michigan Department of Environmental Quality, Waste & Hazardous Materials Division, Southeast State Office Building, 38980 Seven Mile Road, Livonia, MI 48152-1006.

If you have any questions regarding the inspection report, the NOV, or the information requested, please contact Bryan Gangwisch of my staff, at (312) 886-0989.

Sincerely yours,



Paul Little, Chief
Compliance Section 2
Enforcement & Compliance Assurance Branch

Enclosure

cc: Benedict Okwumabua
Waste & Hazardous Materials Division
Michigan Department of Environmental Quality
38980 Seven Mile Road
Livonia, Michigan 48152-1006

Mark Daniels, MDEQ- Southeast District

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604-3590**

MEMORANDUM

DATE: April 7, 2004

TO: Argyri Ioannou, - Environmental Manager
Apollo Plating, Inc.

FROM: Bryan Gangwisch, Environmental Scientist,
Waste, Pesticides and Toxics Division
Enforcement and Compliance Assurance Branch
Compliance Section #2

SUBJECT: Inspection Report for April 7, 2004, Compliance Evaluation Inspection of Apollo Plating, Inc., MID 052 035 425, a Large Quantity Generator located in Roseville, Michigan

A Compliance Evaluation Inspection (CEI) of the Apollo Plating, Inc., facility located at 15765 Sturgeon Road, Roseville, Michigan, was conducted on April 7, 2004. Present for this inspection were the following people:

Todd McNulty, Quality & Risk Manager	Apollo Plating, Inc.
Argyri Ioannou, Environmental Manager	Apollo Plating, Inc.
Mark Daniels, Environmental Quality Analyst	MDEQ
Bryan Gangwisch, Environmental Scientist	U.S. EPA

This facility which is located at 15765 Sturgeon Road was originally constructed in 1969. Apollo Plating, Inc., has performed operations throughout the entire existence of this facility. Apollo performs three types of plating processes and a nickel-stripping operation. Mr. McNulty stated that the legal ownership and operator has not changed and is still Jim Grimes Sr. This facility has always been used for the plating process. Presently this facility employs about 130 people and operates 3 manufacturing shifts, 24 hours per day. One of Apollo Plating's processes involve alkaline zinc plating over cold-rolled steel, nickel-chrome line over stainless and cold-rolled steel, and chrome flash over stainless steel. The main waste streams generated at Apollo consists of electroplating sludge from the wastewater treatment process (F006), and spent acid from the stripping operation (D002). Other waste streams generated are spent waste fluorescent bulbs and used oil which gets mixed with hazardous waste. Most of the waste streams are managed in 55 gallon containers, cubic yard bags, in a cubic yard box, and in a roll-off box. Mr.

McNulty stated that an annual decant of the tanks on the zinc line takes place and the waste is toted or drummed.

This facility consists of one building that is involved with the generation and storage of hazardous waste, along with universal waste (fluorescent light bulbs) and generated used oils. The make-up of the facility includes office space, general storage area, plating lines, and a wastewater treatment system.

A walk-through of the facility was conducted at this time.

The General Storage Area contained four (4) cubic yard bags, which were designated as a hazardous waste storage area for less than 90 days, as stated by Ms. Ioannou. Each bag was closed and labeled as "hazardous waste", "F006", and all the bags were marked with an accumulation date that was less than 90 days old from the date of this inspection. The oldest marked date was 2/24/04. The bags contained no free liquid, but were still contained on pallets. A spill control kit was nearby along with a telephone and a fire extinguisher.

At the wastewater treatment system, there was a cubic yard container (hopper) that contained the filter cake "F006" waste. Ms. Ioannou stated that at this satellite area, the container was filled and moved daily to a less than 90-day roll-off box outside. The container was labeled as "hazardous waste", and "F006". A lid that could be manually removed/replaced was present on the container (hopper). The wastewater is discharged to the Detroit Water and Sewerage Department pursuant to a permit that will expire on 3/1/08.

The Chemical Drum Storage Area, was also designated as a less than 90-day hazardous waste storage area, as stated by Ms. Ioannou. There were four (4) 55-gallon drums that contained waste resulting from the cleaning of the zinc line. One drum that was labeled as "hazardous waste", "D002", and was dated 1/20/04, was designated as a satellite accumulation area because it was not filled as stated by Ms. Ioannou. The satellite drum was closed at this time. The other three drums that were designated less than 90 day storage were labeled as "hazardous waste", "D002", and dated 3/20/04; 3/22/04; and 3/27/04. The three storage drums were closed at this time. The labels however were not easily inspected and aisle space was not sufficient. This storage area was situated upon an impervious surface with no cracks or gaps, and the three storage drums were elevated on pallets. There was no secondary containment for these drums that contained free liquid. A spill control kit was nearby along with a telephone and a fire extinguisher.

The third designated less than 90-day hazardous waste storage area, consisted of a Roll-Off Box (ROB) that was situated outside. The ROB was labeled as "hazardous waste", "F006", and was dated 4/2/04. Ms. Ioannou stated that the ROB that received the filter cake daily from the cubic yard container (hopper), was shipped out approximately once per month. A spill control kit was nearby along with a telephone and a fire extinguisher. This storage area contained no free liquids and the ROB was securely covered with a waterproof tarp. The ROB was also protected from weather and vandals at its outside position and the surface it was situated on was impervious with no cracks or gaps.

The General Storage Area had three (3) 55-gallon drums of used fluorescent bulbs that were not properly contained, and the drums did not have any labels or dates on them. Pictures were taken of these waste bulbs. Mr. McNulty stated that the waste bulbs get disposed about once per year and get recycled.

The facility possessed a public address system, internal alarm, adequate number of fire extinguishers, adequate number of spill control kits, and all supervisors carry Nextel phones.

A records review was conducted at this time.

Manifests are kept on-site for at least 3 years. The most recent manifests show that waste is sent to the following TSDF's: Dynecol, Inc., (MID074259565); and World Resources Company (PAD981038227). The manifests are signed by Dave Shove and Ms. Ioannou. The manifests all had the appropriate land disposal restrictions attached. Copies (generator and TSD) were being forwarded to the MDEQ in Lansing, Michigan.

Inspections of the 90-day hazardous waste storage areas are conducted on a weekly basis. Inspections are conducted by Ms. Ioannou. Apollo maintains inspection logs for at least three years.

Waste determinations are done through Dynecol in Michigan and World Resources in Pennsylvania, or by generator knowledge.

Personnel training for all employees involved in the production/waste handling process has been taking place. According to Ms. Ioannou, she formulates the policies and then trains employees by leading them on a thorough walkthrough of the waste handling procedures specific to Apollo. Apollo was ensuring that all employees are properly trained and thoroughly familiar with emergency procedures as stated by Ms. Ioannou, but there were no records or documentation of a training syllabus provided. Ms. Ioannou did possess an 8 hour refresher that was current, but had no other documentation that she was trained for RCRA management. The training is done by Ms. Ioannou.

The contingency plan contained the following information: emergency coordinators and telephone numbers, list of safety and spill control equipment, facility schematic, evacuation routes, response policy for fire, smoke, and telephone numbers for fire and police departments, hospital, and MDEQ. Arrangements and notifications had been made with local fire, police, and hospitals in case of any emergencies.

Apollo's practice of waste minimization is as follows: Mr. McNulty stated that Apollo does not have a written plan, but is very conscious in making every effort to minimize waste through using a water recycling system which in turns saves on chemicals.

The inspection was concluded at this time.

Documents received during this inspection are as follows:

- Facility schematic of the facility
- A copy of a letter confirming Apollo's wastewater discharge permit is current

Documents given to Apollo during this inspection are as follows:

- U.S. EPA Small Business Resources handout (compliance assistance)

Documents received since the date of this inspection (4/7/04) are as follows:

- None

Attachments:

- A MDEQ Large Quantity Generator (LQG) inspection checklist
- A photo log of the inspection consisting of the following four (4) photos:
 - picture # 1
 - picture # 2
 - picture # 3
 - picture # 4



Department of Environmental Quality, Waste and Hazardous Materials Division

GENERATOR INSPECTION FORM

Facility's Name Apollo Plating, Inc.

Part 3 Rules

Date 4/7/04 ID# MD 052 035 425

1994 PA 451

HAZARDOUS WASTE AND WASTE #	SOURCE	HOW MUCH
Waste filter press cake from F006	WWTS → Electroplating	ROB/month
Spent acid D002	Nitric acid (spent strip solvents)	

— abbreviated

FACILITY COMPLIANCE REQUIRED IN ALL AREAS

NI - Not Inspected N/A - Not Applicable

WASTE DETERMINATION (Rule 302: 40 CFR 262.11)

YES NO

1. Determined if waste streams are hazardous waste? (Rule 302: 40 CFR 262.11)	GGR	<input checked="" type="checkbox"/>	NI N/A
a) copy of waste evaluation on-site 3 years? (Rule 307(1): 40 CFR 262.40(c))	GRR	<input checked="" type="checkbox"/>	NI N/A
b) re-evaluated waste when changes in materials or process? (Rule 302(3))	GGR	<input checked="" type="checkbox"/>	NI N/A
2. Did generator have written waste analysis plan if treating wastes on-site? (Rule 306(1)(d): 40 CFR 268.7(a)(5))	GPT	<input type="checkbox"/>	NI N/A

IDENTIFICATION NUMBER (Rule 303: 40 CFR 262.12)

3. Has the generator obtained an identification number? (Rule 303: 40 CFR 262.12)	GGR	<input checked="" type="checkbox"/>	NI N/A
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MANIFEST REQUIREMENTS (Rule 304: 40 CFR 262.20)

4. Copies of the manifest readily available for review & inspection? (Section 11138(1)(f))	GMR	<input checked="" type="checkbox"/>	NI N/A
5. Manifests kept for the past 3 years? (Rule 307(3): 40 CFR 262.40(a))	GRR	<input checked="" type="checkbox"/>	NI N/A
6. Manifests, prepared by the generator (Rule 304(1)(a): 40 CFR 262.20(a)), contain the following?	GMR	<input checked="" type="checkbox"/>	NI N/A
a) manifest document number. (Rule 304(2)(a): 40 CFR 262.20(a))	GMR	<input checked="" type="checkbox"/>	NI N/A
b) generator's name, address, phone & ID # (Rule 304(2)(b): 40 CFR 262.20(a))	GMR	<input checked="" type="checkbox"/>	NI N/A
c) name & ID # of the transporter. (Rule 304(2)(c): 40 CFR 262.20(a))	GMR	<input checked="" type="checkbox"/>	NI N/A
d) name, address & ID # of TSDF. (Rule 304(2)(d): 40 CFR 262.20(b)&(c))	GMR	<input checked="" type="checkbox"/>	NI N/A
e) DOT description of waste(s). (Rule 304(2)(e): 40 CFR 262.20(a))	GMR	<input checked="" type="checkbox"/>	NI N/A
f) quantity of waste, type & # of containers. (Rule 304(2)(f): 40 CFR 262.20(a))	GMR	<input checked="" type="checkbox"/>	NI N/A
g) hazardous waste number of the wastes. (Rule 304(2)(g): 40 CFR 262.20(a))	GMR	<input checked="" type="checkbox"/>	NI N/A
h) generator signature, initial transporter & date of acceptance? (Rule 304(4)(a)&(b): 40 CFR 262.23(a)(1)&(2))	GMR	<input checked="" type="checkbox"/>	NI N/A
7. Submitted copy of manifests to Director no later than 10 days after month shipment was made? (Rule 304(4)(d))	GMR	<input checked="" type="checkbox"/>	NI N/A
8. For out-of-state manifests, was copy of 3 rd signature manifest submitted to Director? (Rule 304(4)(f))	GMR	<input checked="" type="checkbox"/>	NI N/A
9. Is the transporter used properly registered &/or permitted under Act 138, Section (2)&(3)? (Rule 304(1)(c))	GPT	<input checked="" type="checkbox"/>	NI N/A

NOTE: For shipments of hazardous waste solely by water or rail shipments, within United States see Rule 304(4)(g or h).

10. Using manifest that has expired? (Rule 304(2)(i): 40 CFR 262.20(a))	GMR	<input checked="" type="checkbox"/>	NI N/A
11. Reportable exceptions. (Rule 308(3): 40 CFR 262.42)			
a) number of manifests generator HASN'T receive signed copy from TSD w/in 35 days:	GRR	0	
b) number of manifests generator HASN'T submitted exception reports to RA & DEQ after 45 days:	GRR	0	
12. Facility has written program to reduce volume/toxicity/recycle wastes? (Rule 304(2)(i): 40 CFR 262.20(a))	GMR	<input type="checkbox"/>	NI N/A

OR

13. Facility discusses program in place to reduce volume/toxicity/recycle of waste (Rule 304(2)(i): 40 CFR 262.20(a))	GMR	<input checked="" type="checkbox"/>	NI N/A
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LAND DISPOSAL RESTRICTION REQUIREMENTS
WASTE ANALYSIS AND RECORDKEEPING (Rule 311(1): 40 CFR 268.7))

YES NO

14. Did the generator determine if the waste is restricted from land disposal? (Rule 311(1): 40 CFR 268.7(a)(1))		
a) all listed waste	GLB	<input checked="" type="checkbox"/> NI N/A
b) all characteristic wastes?	GLB	<input checked="" type="checkbox"/> NI N/A

NOTE: If waste has both listed & characteristic waste codes, the treatment standard for the listed waste is sufficient if the treatment standards for the listed waste includes a standard for the constituent that caused the waste to exhibit the characteristic, except for D001 and D002. (40 CFR 268.9(b))

15. If restricted waste exceeds treatment standards or prohibitions did notice go w/ initial shipment? (Rule 311(1):40 CFR 268.7(a)(2))	GLB	<input checked="" type="checkbox"/> NI N/A
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OR

16. If restricted waste does not exceed treatment standards or prohibitions did a notice and certification statement go with initial shipment? (Rule 311(1): (40 CFR 268.7(a)(3))	GLB	<input type="checkbox"/> NI N/A
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OR

17. If waste has exemption from prohibition on the type of land disposal method utilized for the waste, did a notice go with initial shipment? (Rule 311(1): 40 CFR 268.7(a)(4))	GLB	<input type="checkbox"/> NI N/A
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OR

18. If facility choose alternative treatment standard for lab pack that contains none of the waste in appendix IV, did a notice & certification go with initial shipment? (Rule 311(1): 40 CFR 268.7(a)(9))	GLB	<input type="checkbox"/> NI N/A
19. Did the notice include: (Rule 311(1): 40 CFR 268.7(a)(1) or 268.7(a)(2) or 268.7(a)(3))		
a) EPA hazardous waste #?	GLB	<input checked="" type="checkbox"/> NI N/A
b) if wastewater or non-wastewater as defined in 268.2(d&f)?	GLB	<input checked="" type="checkbox"/> NI N/A
c) subcategory of the waste (such as D003 reactive cyanide) if applicable?	GLB	<input checked="" type="checkbox"/> NI N/A
d) manifest number associated with the shipment?	GLB	<input checked="" type="checkbox"/> NI N/A
e) waste analysis data, where available?	GLB	<input checked="" type="checkbox"/> NI N/A
f) waste constituents that the treater will monitor, if monitoring will not include all regulated constituents, for F001- F005, F039, D001, D002, D012-D043? (treatment standards for hazardous waste in table in 268.40 for the waste code under regulated constituents)	GLB	<input checked="" type="checkbox"/> NI N/A

UNLESS

g) did generator/treater claim they are going to monitor for ALL regulated constituents in the waste in lieu of the generator indicating same in the notice? (Rule 311(1): 40 CFR 268.7(a)(1) & 268.9)	GLB	<input type="checkbox"/> NI N/A
h) did generator/treater claim they are going to monitor for underlying hazardous waste constituents (except vanadium and zinc), reasonably expected to be present at the generation point, above UTS standards for D001, D002 & TCLP organics? (Rule 311(1): 40 CFR 268 Subpart D & 268.48)	GLB	<input type="checkbox"/> NI N/A
20. Other than notices for waste exceeding treatment standards, did notices include: (Rule 311(1): 40 CFR 268.7(2)(3))		
a) if the notice is for shipments that meet the standards does the notice include the certification?	GLB	<input type="checkbox"/> NI N/A
b) if the notice is for shipments under prohibitions does the notice include a statement that the waste isn't prohibited from land disposal & date the waste is subject to prohibition?	GLB	<input type="checkbox"/> NI N/A

NOTE: An alternate treatment standard may be used after approval from the Administrator. (40 CFR 268.44)

NOTE: Hazardous waste debris see 40 CFR 268.7(a)(1)(iv) for the notice requirements which must be followed by the statement "This hazardous debris is subject to alternative treatment standards of 40 CFR 268.45."

21. Generator retain on-site records to support determination from knowledge or results from tests? (40 CFR 268.7(a)(6))	GLB	<input checked="" type="checkbox"/> NI N/A
22. If the restricted waste is excluded from being a hazardous waste or solid waste did the generator place a one- time notice stating same in the facility file? (40 CFR268.7(a)(7))	GLB	<input type="checkbox"/> NI N/A
23. All notices/certifications/demonstrations/other documents retained for 3 years on-site? (40 CFR 268.7(a)(8)).	GLB	<input checked="" type="checkbox"/> NI N/A

NOTE: This requirement (268.7(a)(8)) applies to solid waste even when the hazardous waste characteristic is removed prior to disposal or when the waste is excluded from the definition of hazardous waste or solid waste.

DILUTION PROHIBITED AS SUBSTITUTE FOR TREATMENT (RULE 311(1):40 CFR 268.3)

24. Generator dilute hazardous waste or treatment residue of a hazardous waste to avoid prohibition? (40 CFR: 268.3(a))	GLB	<input checked="" type="checkbox"/> NI N/A
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TREATMENT STANDARDS (RULE 311(1):40 CFR 268.40)

25. If wastes exceeding treatment standards are mixed, was the most stringent standards selected? (40 CFR268.40(c))	GLB	<input checked="" type="checkbox"/> NI N/A
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BIENNIAL REPORT (Rule 308: 40 CFR 262.41)

YES NO

26. Generator submitted biennial report by 3/1 (even years)? (Rule 308(1): 40 CFR 262.41)	GRR	<input checked="" type="checkbox"/>	NI N/A
27. Were copies of the report retained at least 3 years? (Rule 307(4): 40 CFR 262.40(b))	GRR	<input checked="" type="checkbox"/>	NI N/A

PRE-TRANSPORTER REQUIREMENTS (Rule 305: 40 CFR 262.30)

28. Waste packaged according to DOT regulations (required before shipping waste off-site)? (Rule 305(1)(a): 40 CFR 262.30)	GPT	<input checked="" type="checkbox"/>	NI N/A
29. Are waste packages marked & labeled according to DOT concerning hazardous materials (required before shipping waste off-site)? (Rule 305(1)(b)(c): 40 CFR 262.32(a))	GPT	<input checked="" type="checkbox"/>	NI N/A
30. On containers 110 gallons or less, is there a warning, generator's name, address, manifest document # & waste code; 49 CFR 172.304? (Rule 305(1)(d): 40 CFR 262.32(b))	GPT	<input checked="" type="checkbox"/>	NI N/A
31. If required (>1000 #'s), are placards available to the transporter? (Rule 305(1)(e): 40 CFR 262.33)	GPT	<input checked="" type="checkbox"/>	NI N/A

ACCUMULATION TIME (Rule 306: 40 CFR 262.34)

32. If hazardous waste accumulated in containers: (If no, skip to #35)			
a) containers have accumulation date & visible? (Rule 306(1)(b): 40 CFR 262.34(a)(2))	GPT	<input checked="" type="checkbox"/>	NI N/A
b) container have words "Hazardous Waste"? (Rule 306(1)(c): 40 CFR 262.34(a)(3))	GPT	<input checked="" type="checkbox"/>	NI N/A
c) is each container clearly marked with the hazardous waste number? (Rule 306(1)(b))	GPT	<input checked="" type="checkbox"/>	NI N/A
d) has more than 90 days elapsed since date marked? (Rule 306(1))	GPT	<input checked="" type="checkbox"/>	NI N/A

UNLESS

e) the generator applied for & received an extension to accumulate longer? (Rule 306(3): 40 CFR 262.34(b))	GPT	<input type="checkbox"/>	NI (N/A)
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The following Subpart I, 265.170 to 265.177 requirements are referred to by Rule 306(1)(a) and 40 CFR 262.34(a)(1).

f) are containers in good condition? (265.171)	GPT	<input checked="" type="checkbox"/>	NI N/A
g) are containers compatible with waste in them (265.172)	GPT	<input checked="" type="checkbox"/>	NI N/A
h) are containers stored closed? (265.173(a))	GPT	<input checked="" type="checkbox"/>	NI N/A
i) containers handled/stored in a way which may rupture it or cause leaks? (265.173(b))	GPT	<input checked="" type="checkbox"/>	NI N/A
j) ignitable & reactive wastes stored 15 meters (50 feet) from property line? (265.176)	GPT	<input type="checkbox"/>	NI (N/A)
k) are containers inspected weekly for leaks and defects? (265.174)	GPT	<input checked="" type="checkbox"/>	NI N/A
l) did the generator document the inspections in 32(k)? (Rule 306(1)(a)(i))	GPT	<input checked="" type="checkbox"/>	NI N/A
m) inspection documents maintained on-site 3 years? (Rule 306(1)(a)(i))	GPT	<input checked="" type="checkbox"/>	NI N/A
n) are incompatible wastes stored in separate containers? (265.177(a))	GPT	<input type="checkbox"/>	NI (N/A)
o) hazardous wastes put in unwashed containers that previously held incompatible waste. (265.177(b))	GPT	<input type="checkbox"/>	NI (N/A)
p) incompatible waste separated/protected from each other by physical barriers or sufficient distance? (265.177(c))	GPT	<input type="checkbox"/>	NI (N/A)

Rule 306(2) & 40 CFR 262.34(c)(1)(i) both refer to 40 CFR 265.171, 265.172 & 265.173(a).

33. If hazardous waste is being accumulated at the point of generation:			
a) container(s) <55 gal or 1 qt acutely/severely toxic? (Rule 306(2): 40 CFR 262.34(c)(1))	GPT	<input checked="" type="checkbox"/>	NI N/A
b) container(s) under operator control & near the point of generation? (Rule 306(2): 40 CFR 262.34(c)(1))	GPT	<input checked="" type="checkbox"/>	NI N/A
c) container(s) have words "Hazardous Waste"? (Rule 306(2): 40 CFR 262.34(c)(1)(ii))	GPT	<input checked="" type="checkbox"/>	NI N/A
d) are the container(s) marked with the hazardous waste number or chemical name? (Rule 306(2))	GPT	<input checked="" type="checkbox"/>	NI N/A
e) are container(s) in good condition? (265.171)	GPT	<input checked="" type="checkbox"/>	NI N/A
f) are container(s) compatible with waste in them? (265.172)	GPT	<input checked="" type="checkbox"/>	NI N/A
g) container(s) closed when not in use & managed to prevent leaks? (265.173(a))	GPT	<input checked="" type="checkbox"/>	NI N/A
34. If generator exceeds 55 gallons or 1 quart, w/in 3 days does generator, w/respect to that amount of excess waste:			
a) mark the container with the date the excess amount began accumulating? (Rule 306(2): 40 CFR 262.34(c)(2))	GPT	<input checked="" type="checkbox"/>	NI N/A
b) move to an area with secondary containment?	GPT	<input type="checkbox"/>	NI N/A

Rule 306(1)(a) refers to containment requirements in 40 CFR 264.175.

35. If accumulating free liquids or any F020, F021, F022, F023, F026, F027, does the hazardous waste storage area include			
a) impervious base free of cracks? (264.175(b)(1))	GPT	<input checked="" type="checkbox"/>	NI N/A

		YES	NO
b) sloped or otherwise designed to elevate/protect containers from contact with liquids? (264.175(b)(2))	GPT	<input checked="" type="checkbox"/>	NI N/A
c) hold 10% of volume of containers or volume of the largest container, whichever is greater? (264.175(b)(3))	GPT	<input type="checkbox"/> <input checked="" type="checkbox"/>	NI N/A
d) run-on prevented unless sufficient capacity? (264.175(b)(4))	GPT	<input checked="" type="checkbox"/>	NI N/A
e) accumulated liquids removed in a timely manner to prevent overflow? (264.175(b)(5))	GPT	<input checked="" type="checkbox"/>	NI N/A

NOTE: Closure of Accumulation Area covered under # 53.

36. If accumulating solids, (other than F020, F021, F022, F023, F026, F027), is haz waste accumulation area sloped or otherwise designed, or containers elevated or otherwise protected from contact with liquids? (264.175(c)(1 & 2))	GPT	<input checked="" type="checkbox"/>	NI N/A
37. Is hazardous waste accumulated in other than tanks or containers? Or, is hazardous waste generated but not accumulated, i.e.: process tank? <i>Explain any yes answer. Dry Food bags</i>		<input checked="" type="checkbox"/>	NI N/A
38. Waste area protected from weather, fire, physical damage & vandals? (Rule 306(1)(e))	GPT	<input checked="" type="checkbox"/>	NI N/A
39. Hazardous waste accumulated so no hazardous waste or hazardous waste constituent can escape by gravity into soil, directly or indirectly, into surface, ground-waters, drains or sewers, and such that fugitive emissions do not violate Act 451, Part 55? (Rule 306(1)(f))	GPT	<input checked="" type="checkbox"/>	NI N/A
40. Is hazardous waste accumulated in tanks? <i>If so, complete Tank System inspection form.</i>		<input checked="" type="checkbox"/>	NI N/A
41. Is hazardous waste placed on drip pads? <i>If so, complete Wood Preserving inspection form</i>		<input checked="" type="checkbox"/>	NI N/A

Rule 306(1)(d) & 40 CFR 262.34(a)(4) refers to 265.16
PERSONNEL TRAINING (265.16)

42. Did personnel receive training? (265.16)	GPT	<input checked="" type="checkbox"/>	NI N/A
43. Do personnel training records contain the following:			
a) job title? (265.16(d)(1))	GPT	<input type="checkbox"/> <input checked="" type="checkbox"/>	NI N/A
b) job descriptions? (265.16(d)(2))	GPT	<input type="checkbox"/> <input checked="" type="checkbox"/>	NI N/A
c) name of employee filling each job? (265.16(d)(1))	GPT	<input type="checkbox"/> <input checked="" type="checkbox"/>	NI N/A
d) description of type & amount of both introductory & continued training? 265.16(d)(3))	GPT	<input type="checkbox"/> <input checked="" type="checkbox"/>	NI N/A
e) training designed so facility personnel can respond to emergencies? (265.16(a)(3))	GPT	<input checked="" type="checkbox"/>	NI N/A
f) records of training? (265.16(d)(4))	GPT	<input type="checkbox"/> <input checked="" type="checkbox"/>	NI N/A
g) do new personnel receive required training within 6 months? (265.16(b))	GPT	<input checked="" type="checkbox"/>	NI N/A
h) do training records show personnel have taken part in annual training? (265.16(c))	GPT	<input type="checkbox"/> <input checked="" type="checkbox"/>	NI N/A
i) training by person trained in hazardous waste management procedures? (265.16(a))	GPT	<input checked="" type="checkbox"/>	NI N/A

Rule 306(1)(d) & 40 CFR 262.34(a)(4) refer to 265, Subpart C, 265.30-265.37.
PREPAREDNESS AND PREVENTION (265.30-265.37)

44. Facility maintained/operated to minimize possibility of fire, explosion, release of hazardous waste or hazardous waste constituent which could threaten human health/environment? (265.31)	GPT	co.said <input checked="" type="checkbox"/> obsrvd <input type="checkbox"/>	NI N/A
45. If required, does this facility have the following::			
a) internal communications or alarm systems? (265.32(a))	GPT	<input checked="" type="checkbox"/>	NI N/A
b) telephone or 2-way radios at the scene of operations? (265.32(b))	GPT	<input checked="" type="checkbox"/>	NI N/A
c) portable fire extinguishers, fire control, spill control equipment and decontamination equipment? (265.32(c))	GPT	<input checked="" type="checkbox"/>	NI N/A
d) adequate volume of water and/or foam available for fire control? (265.32(d))	GPT	<input checked="" type="checkbox"/>	NI N/A
46. Testing and Maintenance of Emergency Equipment			
a) owner/operator test & maintain emergency equipment to assure operation? (265.33)	GPT	<input checked="" type="checkbox"/>	NI N/A
b) has owner/operator provided immediate access to internal alarms? Access to alarm system is applicable only if required (40 CFR 265.32)			
i) when hazardous waste is being poured, mixed, etc. (265.34(a))	GPT	<input type="checkbox"/>	NI <input checked="" type="checkbox"/>
ii) one employee on the premises while facility is operating. (265.34(b))	GPT	<input checked="" type="checkbox"/>	NI N/A
c) aisle space for unobstructed movement of personnel/emergency equipment? (265.35)	GPT	<input type="checkbox"/> <input checked="" type="checkbox"/>	NI N/A
47. Has the facility made arrangements with local authorities? (265.37(a)&(b))	GPT	<input checked="" type="checkbox"/>	NI N/A

Rule 306(1)(d) & 40 CFR 262.34(a)(4) refer to Subpart D, 265.50-265.56.
CONTINGENCY PLAN AND EMERGENCY PROCEDURES (265.50-265.56)

		YES	NO
48. Plan implemented whenever fire/explosion/release could threaten human health or the environment? (265.51(b))	GPT	<input checked="" type="checkbox"/>	NI N/A
49. Does the contingency plan contain the following:			
a) actions personnel must take responding to fires/explosions/unplanned release of hazardous waste? (265.52(a & b))	GPT	<input checked="" type="checkbox"/>	NI N/A
b) describe arrangements w/ local police, fire, hospitals, contractors, state & local emergency responders for emergency services; (265.52(c)) & (265.37(a)&(b))?	GPT	<input checked="" type="checkbox"/>	NI N/A
c) name, addresses & phone (office & home) of emergency coordinator? (265.52)(d))	GPT	<input checked="" type="checkbox"/>	NI N/A
d) list emergency equipment at the facility, including location, physical description & capabilities? (265.52(e))	GPT	<input checked="" type="checkbox"/>	NI N/A
e) evacuation plan for personnel w/ signal(s), evacuation routes & alternate evacuation routes. (265.52(f))	GPT	<input checked="" type="checkbox"/>	NI N/A
50. Does the facility have an Emergency Coordinator? (265.55)	GPT	<input checked="" type="checkbox"/>	NI N/A
Emergency Coordinator and Emergency Procedures:			
a) emergency coordinator familiar with site operation & emergency procedures? (265.55)	GPT	<input checked="" type="checkbox"/>	NI N/A
b) emergency coordinator has the authority to carry out the contingency plan? (265.55)	GPT	<input checked="" type="checkbox"/>	NI N/A
c) if emergency occurred, did the emergency coordinator follow emergency procedures? (265.56)	GPT	<input type="checkbox"/>	NI (N/A)
d) fire/explosion/other release of hazardous waste/haz. waste constituents, could threaten human health or environment or generator has knowledge spill reached surface or ground water, did generator notify MDEQ? (Rule 306(1)(d))	GPT	<input type="checkbox"/>	NI (N/A)
51. Contingency plan Amendments and Copies			
a) amended: fails in emergency; changes in regulations/emergency coordinators/emergency equipment? (265.54)	GPT	<input type="checkbox"/>	NI (N/A)
b) copies of plan on site and sent to local emergency organizations? (265.53)	GPT	<input checked="" type="checkbox"/>	NI N/A

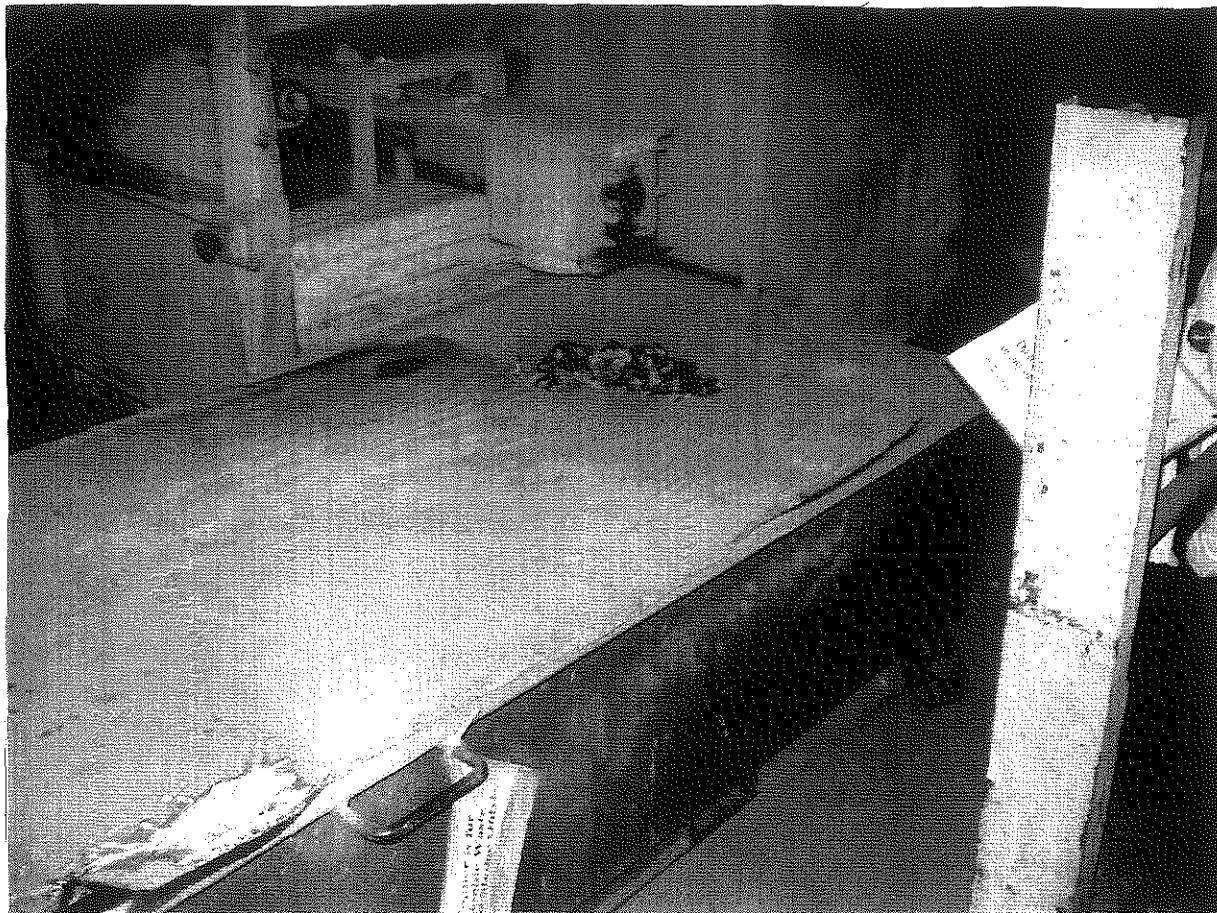
Rule 309 refers to 262, Subpart E except 262.54 & 262.55
INTERNATIONAL SHIPMENTS (Rule 309 & 310: 40 CFR 262.50-262.60)

52. Has the facility imported or exported hazardous waste?	GEX		NI (N/A)
a) exporting, has the generator:			
i) notified the Administrator in writing <12 months prior to shipment? (Rule 309(1): 40 CFR 262.53(a))	GEX	<input type="checkbox"/>	NI (N/A)
ii) receiving country consented to accept waste. (Rule 309(1): 40 CFR 262.52(b))	GEX	<input type="checkbox"/>	NI (N/A)
iii) has copy of EPA Acknowledgment of Consent. (Rule 309(1): 40 CFR 262.52(c))	GEX	<input type="checkbox"/>	NI (N/A)
iv) complied with manifest requirements in Rule 309(2)(a-i).	GEX	<input type="checkbox"/>	NI (N/A)
v) if required, was an exception report filled. (309(3)(a-c))	GEX	<input type="checkbox"/>	NI (N/A)
b) importing, has the generator met manifest requirements? (Rule 310: 40 CFR 262.60)	GIX	<input type="checkbox"/>	NI (N/A)

Rule 306(1)(g) and 40 CFR 262.34(a)(1) refers to 40 CFR 265.111 & 265.114
ACCUMULATION AREA CLOSURE (265.111 & 265.114)

53. The accumulation area must be closed in a manner that:			
a) minimizes need for further maintenance (Rule 306(1)(g): 40 CFR 265.111(a))	GPT	<input type="checkbox"/>	NI (N/A)
b) controls/minimizes/eliminates, to protect human health & environment, the escape of haz. waste or haz. waste constituents, leachate, run-off to ground/surface waters and air. (Rule 306(1)(g): 40 CFR 265.111(b))	GPT	<input type="checkbox"/>	NI (N/A)
c) all contaminated equipment, structures, and soil properly disposed of. (Rule 306(1)(g): 40 CFR 265.114)	GPT	<input type="checkbox"/>	NI (N/A)

COMMENTS:



1. A cubic yard hazardous waste satellite container (hopper) that contained F006 filter cake, the container had a waste code, was labeled as "hazardous waste", and was dated

Apollo Plating, Roseville, MI
Bryan Gangwisch, USEPA

4/7/04



2. 55-gallon hazardous waste storage containers that contained D002 waste from cleaning of the zinc line had waste codes, were closed, labeled as "hazardous waste", but labels were not visible for inspection

Apollo Plating, Roseville, MI
Bryan Gangwisch, USEPA

4/7/04



3. The same hazardous waste storage containers as the previous photo (2.), aisle space is insufficient and no secondary containment available (free liquids)

Apollo Plating, Roseville, MI
Bryan Gangwisch, USEPA 4/7/04

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Argyri Ioannou, Environmental Manager
Apollo Plating, Inc.
15765 Sturgeon Road
Roseville, Michigan 48066

COMPLETE THIS SECTION ON DELIVERY**A. Received by (Please Print Clearly)** **B. Date of Delivery**

Ronal Gillespie 6/9/04

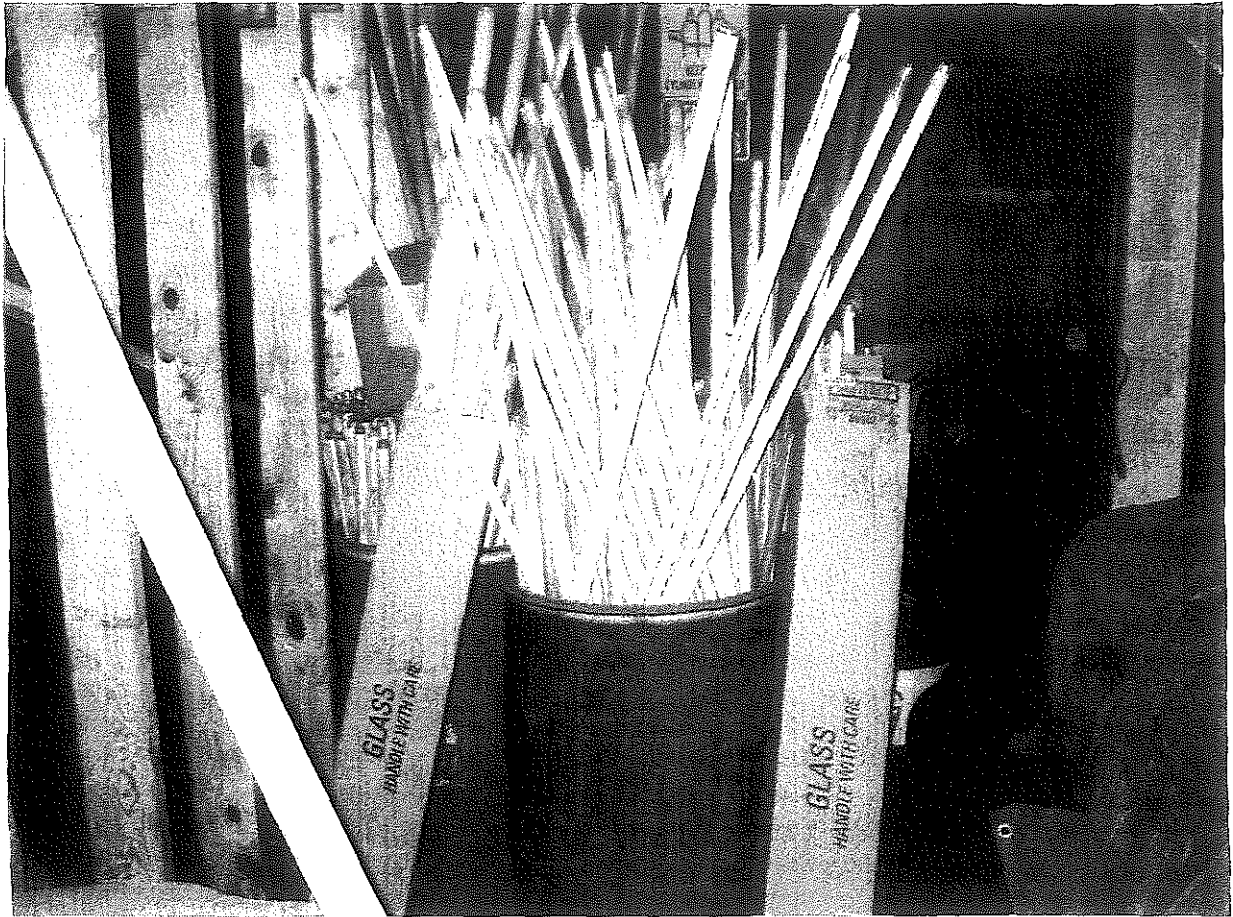
C. Signature

Ronal Gillespie

☐ Agent☐ Addressee**D. Is delivery address different from item 1?** ☐ YesIf YES, enter delivery address below: ☐ No**3. Service Type**☒ Certified Mail ☐ Express Mail☐ Registered ☒ Return Receipt for Merchandise☐ Insured Mail ☐ C.O.D.**4. Restricted Delivery? (Extra Fee)**☐ Yes**2. Article Number**

(Transfer from service label)

7001 0320 0006 0177 3319



4. Three 55-gallon containers holding used waste fluorescent bulbs, not labeled, or dated, and not contained properly

Apollo Plating, Roseville, MI
Bryan Gangwisch, USEPA 4/7/04



Waste, Pesticides and Toxics Division

Type of Document: ☒ Notice of Violation and Inspection Report/Checklist / 3007
☐ No Violation Letter and Inspection Report/Checklist
☐ Letter of Acknowledgment
☐ Information Request
☐ Pre-Filing and Opportunity to Confer
☐ State Notification of Enforcement Action

Facility Name: Apollo Plating, Inc.

Facility Location: 15765 Sturgeon Road

City: Roseville State: MI

U.S. EPA ID# MID 052 035 425

Assigned Staff Bryan Gangwisch Phone: 6-0989

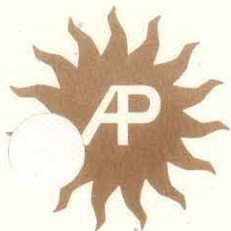
Name	Signature	Date
Author	<i>Bryan Gangwisch</i>	5/28/04
Regional Counsel	<i>Sandra Lee per e-mail attached</i>	5/27/04
Section Chief	<i>[Signature]</i>	6-4-04
Branch Chief		

Directions/Request for Clerical Support:

After the Section Chief/Branch Chief signs this sheet and original letter:

1. Date stamp the cover letter;
2. Make four copies of the contents of this folder:
 - One copy for the assigned staff;
 - One copy for the section file;
 - One copy for the branch file; and
 - One copy for the official file.
3. Make any additional copies for cc's or bcc's.
4. Mail the original certified mail and distribute office copies and cc's and bcc's.
Once the certified mail receipt is returned:
5. File the certified mail receipt (green card), with this sign-off sheet and the official file copy, and take to 7th floor RCRA file room;
6. E-mail staff the date that the letter was received by facility.

90010320 0006 0177 3319



APOLLO PLATING, INC.

Meeting Expectations

15765 Sturgeon • Roseville, Michigan 48066

Phone: 586.777.0070 • Fax 586.777.7430

E-mail: www.apolloplatinginc.com

June 23, 2004

Via FedEx – next day air

U.S. EPA, Region 5
Enforcement and Compliance Assurance Branch (DE-9J)
77 W. Jackson Blvd.
Chicago IL 60604

Attn: Mr. Bryan Gangwisch

Re: Notice of Violation
Apollo Plating, Roseville, Michigan
EPA ID No. MID 052 035 425

Gentlemen:

In regard to the EPA's April 7, 2004, inspection, and the violations stated in the June 7, 2004, Notice of Violation letter from the EPA, Apollo Plating offers the following responses for your consideration. Appearing below are the numbered paragraphs from the June 7, 2004 EPA letter, followed by the company's response. An additional copy of this response is also enclosed.

- 1. In order to avoid the need for a hazardous waste storage license, a large quantity generator must clearly mark and make visible for inspection on its hazardous waste containers the date upon which each period of accumulation begins, and the hazardous waste number of the waste. See Michigan Administrative Code R299.9306(1)(b); 299.9502(1) [40 CFR § 262.34(a)(2) and (3); 270.1(c); and 270.10(a) and (d)].***

During the inspection of the hazardous waste storage area consisting of three (3) containers that were storing D002 waste from the cleaning of the zinc lines, the hazardous waste containers were stored in such a manner that the labels were not

readily visible for inspection. Apollo therefore failed to comply with the above-mentioned condition for a storage license exemption.

1. In order to show and maintain continuous ongoing compliance with Michigan Administrative Code R299.9306(1)(b); 299.9502(1) [40 CFR § 262.34(a)(2) and (3); 270.1(c); and 270.10(a) and (d)], Apollo Plating immediately adjusted presentation of the containers used to store D002 liquid waste to conform to the readily visible requirement of the above codes. See attached Photo #2 for current placement.
2. ***In order to avoid the need for a hazardous waste storage license, a large quantity generator must maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency, unless aisle space is not needed for any of these purposes. See MAC R 299.9306(1)(d); 40 CFR § 265.35 [40 CFR § 262.34(a)(4)]. This is also a requirement for owners and operators of hazardous waste storage facilities, under 40 CFR § 265.35 and MAC R299.9601(3).***

During the inspection of the same hazardous waste storage area as mentioned above, the aisle space between the containers storing D002 waste was insufficient. Pallets of empty containers/containers with parts were stored directly next to the hazardous waste storage area. Also, the hazardous waste storage drums were right up against the perimeter wall of the facility, as passage was not possible to inspect all of the labels. Apollo therefore has failed to comply with the above-referenced conditions for a license exemption, and has violated the storage facility aisle space requirements.

2. In order to show and maintain continuous and ongoing compliance with Michigan Administrative Code R 299.9306(1)(d); 40 CFR § 265.35 [40 CFR § 262.34(a)(4)], Apollo Plating immediately established the required aisle space to allow access to stored containers of D002 liquid waste from any and all approaches. Additionally, a permanent identified storage area was established. See attached Photo #2.
3. ***In order to avoid the need for a hazardous waste storage license, a large quantity generator must provide a containment system that has sufficient capacity to contain 10% of the volume (free liquids) of containers or the volume of the largest container, whichever is***

greater. See, MAC R299.9306(1)(a)(i), 40 CFR § 264.175(b)(3). This is also a requirement for owners and operators of hazardous waste storage facilities, under MAC R299.9601(2)(g) and R299.9614(1)(a).

During the inspection of the same hazardous waste storage area mentioned above, the hazardous waste (D002) storage containers were elevated on pallets, however there was no containment system to sufficiently contain any potential leak, discharge, or spill. Apollo therefore has failed to comply with the above-referenced conditions for a license exemption, and has violated the storage facility containment system requirements.

3. In order to show and maintain continuous and ongoing compliance with Michigan Administrative Code 299.9306(1)(a)(i), 40 CFR § 264.175(b)(3), Apollo Plating immediately moved the D002 liquid waste containers onto liquid containment pallets of sufficient capacity to contain 10% of the volume of free liquids of stored containers or the volume of the largest container stored thereon, in the event of a leak, discharge or spill. See attached Photo #2.
4. *In order to avoid the need for a hazardous waste storage license, a large quantity generator must ensure that facility personnel with hazardous waste management responsibilities successfully complete an initial training program which includes all the elements of 40 CFR § 265.16(d) and is directed by a person trained in hazardous waste management procedures; and receive review training annually thereafter. See, MAC R299.9306(1)(d), 40 CFR § 265.16(a)-(c) [40 CFR § 262.34(a)(4)]. This is also required of owners and operators of hazardous waste storage facilities, under MAC R299.9601(3)(b), 40 CFR § 265.16(a)-(c), MAC R299.9605(1), and 40 CFR §§ 264.16(a)-(c).*

During the inspection of records, Apollo personnel stated that employees are properly trained and thoroughly familiar with waste handling procedures specific to this facility, but there were no records or documentation of a training syllabus provided and no other documentation was provided in lieu of a RCRA component. Therefore, Apollo has failed to comply with the above-referenced condition for a license exemption, and has violated the storage facility training requirements.

4. In order to demonstrate compliance and training of facility personnel with the responsibilities associated with hazardous waste management per 40 CFR § 265.16(d), Apollo Plating is submitting for review of compliance document identified as Attachment F

In order to demonstrate compliance of training by an individual trained in hazardous waste management and annual review training per Michigan Administrative Code R299.9306(1)(d), 40 CFR § 265.16(a)-(c) [40 CFR § 262.34(a)(4)]. Apollo Plating is submitting for review of compliance documents identified as Attachments G and H.

5. ***A universal waste small quantity handler shall manage used electric lamps in a manner that prevents breakage or the release of any universal waste or components of universal waste by containing unbroken lamps in structurally sound packaging that is compatible with the contents of the lamps and will prevent breakage during normal handling conditions. The packaging shall remain closed and lack evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions. Also, the lamps or packaging in which the lamps are contained shall be labeled with the words "universal waste electric lamps", "waste electric lamps", or "used electric lamps." A small quantity handler of universal waste who accumulates universal waste must be able to demonstrate the length of time that the universal waste has been accumulated from the date it becomes a waste or is received. See, MAC R299.9228(4)(c)(ii), 299.9228(4)(c)(iv), and 299.9228(4)(a) [40 CFR § 273.13(d); 273.14(e); and 273.15(c)].***

During the inspection of the general floor operations, there were waste electric lamps stored in three 55-gallon containers. The waste lamps were not properly contained to prevent breakage, not dated, or labeled with the words "waste electric lamps." Therefore, Apollo has violated the small quantity handler requirement for properly containing waste lamps.

5. In order to show and maintain continuous ongoing compliance with Michigan Administrative Code R299.9228(4)(c)(ii), 299.9228(4)(c)(iv), and 299.9228(4)(a) [40 CFR § 273.13(d); 273.14(e); and 273.15(c)], Apollo Plating immediately, the day following inspection, moved to proper storage containers all identified waste electric lamps. Additionally, a permanent identified storage area was established. See attached Photo # 1.

6. ***A large quantity generator who accumulates hazardous waste on-site for 90 days or less, and who does not meet the conditions for a license exemption of MAC R 299.9306(1)-(2) [40 CFR § 262.34(a)], is an operator of a hazardous waste storage facility, and is required to obtain a hazardous waste storage license. See, MAC R299.9502(1), 299.9508, and 299.9510 [40 CFR §§ 270.1, 270.10, 270.13]. On failing to comply with the above-referenced conditions for a permit exemption, Apollo's failure to apply for and obtain a storage license violated these licensing requirements.***
6. In order to show license exemption conditions are maintained in accordance with Michigan Administrative Code R299.9306(1)-(2) [40 CFR § 262.34(a)], Apollo Plating has complied with all items as contained in the Notice of Violation referred to herein.

*

*

*

Additional Information

1. ***Please provide the following information regarding Apollo's hazardous waste management at its facility located at 15765 Sturgeon Road, Roseville, Michigan 48066:***

a. ***State the specific efforts Apollo has taken, or plans to take, to correct the noncompliances and violations set forth in the Notice of Violation (NOV) above;***

a. As noted in the NOV, the items deemed to be out of compliance have been brought into compliance as follows:

The areas previously used as storage for universal waste, D002 liquids and F006 debris storage have been relocated to an open, well-lighted, permanent storage location. See attached Photo #4. Apollo Plating has prepared a written syllabus for training purposes and has also expanded the training for individuals assigned to hazardous waste management responsibilities per Attachments A-F.

b. ***State and provide documentation of all capital and operation and maintenance costs incurred to correct the violations set forth in the NOV above;***

b. In order to rectify conditions as listed within the NOV, Apollo

Plating incurred operating and maintenance costs as follows:

1. Purchase of universal waste containment dunnage at a cost of \$40.00. See Attachment I.
2. Hazardous waste management training as provided through an outside entity at a cost of \$1000.00. See Attachment J.

c. If any of the violations set forth in the NOV are continuing, submit Apollo's plan for returning to compliance.

c. Each of the items listed within the NOV have been brought into compliance.

2. For each facility employee that received annual or initial hazardous waste training in 2002, provide the following information:

a. State whether any type of hazardous waste training was provided to the employee at any time during 2003;

a. All applicable employees received hazardous waste management training during 2003. See Attachments A-E.

b. If hazardous waste training was provided to the employee in 2003, provide the date of the training;

b. Training was conducted on November 5 and November 11, 2003.

c. Provide the name of the person(s) who provided the employee's hazardous waste training in 2003;

c. Argyri Ioannou

d. Provide a true and accurate copy of all records, including electronic records, in Apollo's control, that document or support the information provided in response to 2(a)-(c) above.

d. See Attachments A-E, G-H.

3. For each provider of hazardous waste training listed in response to item 2.c above, provide the following information:

a. State whether the provider was trained in hazardous waste management procedures at the time that the provider trained the employee in hazardous waste management.

a. Ms. Ioannou was originally trained in August of 1998 and received refresher training on November 5, 2003. See Attachments G and H.

Apollo Plating, Inc.

By James E. Grimes
James E. Grimes
President

STATE OF MICHIGAN)
)ss
COUNTY OF MACOMB)

On this 23rd day of June, 2004, before me personally appeared the above-named JAMES E. GRIMES, who made oath that all statements made herein are true to the best of his knowledge, information and belief.

Sandra Domine, Notary Public
St. Clair County, Michigan
Acting in Macomb County, Michigan
My commission expires: Aug. 9, 2008

cc: Mr. Benedict Okwumabua
Michigan Department of Environmental Quality
Waste & Hazardous Materials Division
Southeast State Office Building
38980 Seven Mile Road
Livonia MI 48152-0989
(via FedEx, next day air)

EMPLOYEE HAZARDOUS WASTE TRAINING

RECORDS

PERSONNEL MUST RECEIVE INITIAL TRAINING WITHIN SIX MONTHS AFTER THE DATE OF THEIR EMPLOYMENT OR ASSIGNMENT TO A JOB THAT IS RELATED TO THE MANAGEMENT OF HAZARDOUS WASTE. AFTER THE INITIAL TRAINING FACILITY PERSONNEL MUST BE TRAINED ANNUALLY.

EMPLOYEE NAME: ARGYRI P IOANNOU

JOB TITLE: ENVIRONMENTAL MANAGER

JOB DESCRIPTION:

MONITORING THE PRETREATMENT SYSTEM FOR COMPLIANCE
IN CHARGE OF HAZARDOUS WASTE FOR THE FACILITY
EMERGENCY COORDINATOR
STORM WATER CERTIFY OFFICER
WATER RECYCLING SYSTEM

INITIAL TRAINING: DEC 08, 1995

ANNUAL TRAINING: NOV 5, 2003

TYPES AND AMOUNT OF TRAINING:

ARGYRI P IOANNOU HAD ON THE JOB TRAINING FOR

COMMUNICATIONS SYSTEMS
EMERGENCY PROCEDURES
RESPONSE TO FIRES OR EXPLOSIONS
SHUTDOWN OF OPERATIONS,
RESPONSE TO UNPLANNED SUDDEN OR NON-SUDDEN RELEASES OF HAZARDOUS WASTE
CONSTITUENTS TO AIR, SOIL OR SURFACE WATER
CONTINGENCY PLAN IMPLEMENTATION
SLUG/SPILL PREVENTION PLAN

ONE DAY CLASSROOM TRAINING ON

REGULATION 101
MATERIAL SAFETY DATA SHEETS
RIGHT -TO- KNOW
HAZARDOUS MATERIALS HANDLING
CONFINED SPACES ENTRY
STORM WATER OPERATOR AND CERTIFY OFFICER
RCRA/PART III COMPLIANCE
ENVIRONMENTAL LAW, HEALTH AND SAFETY
ISO 14000

NOTE: ANY PERSONNEL TRAINING PROVIDED WILL INCLUDE ANY UPDATES/REVISIONS TO THE CONTINGENCY PLAN.

SIGN: Argyri P Ioannou

EMPLOYEE HAZARDOUS WASTE TRAINING

RECORDS

PERSONNEL MUST RECEIVE INITIAL TRAINING WITHIN SIX MONTHS AFTER THE DATE OF THEIR EMPLOYMENT OR ASSIGNMENT TO A JOB THAT IS RELATED TO THE MANAGEMENT OF HAZARDOUS WASTE. AFTER THE INITIAL TRAINING FACILITY PERSONNEL MUST BE TRAINED ANNUALLY.

EMPLOYEE NAME TODD MCNULTY

JOB TITLE: VICE PRESIDENT OF ENGINEERING

JOB DESCRIPTION:

MACHINE REPAIR
ELECTRICIAN
EQUIPMENT ENHANCEMENTS
GENERAL MAINTENANCE
TOOL DESIGN

INITIAL TRAINING: DEC 09, 1995

ANNUAL TRAINING: NOV 11, 2003

TYPES AND AMOUNT OT TRAINING:

ON THE JOB TRAINING FOR SIX MONTHS

EMERGENCY SYSTEMS (COMMUNICATION & ALARMS)
EMERGENCY EQUIPMENT (WATER MAINS, GLOVES, BREATHING APPARATUS, FIRE EXTINGUISHERS).
RESPONSE TO FIRES OR EXPLOSIONS
SHUT DOWN OPERATIONS
CONTINGENCY PLAN IMPLEMENTATION

ONE DAY CLASSROOM TRAINING ON

HAZARDOUS MATERIALS
RIGHT TO KNOW
CONFINED SPACES ENTRY

NOTE: ANY PERSONNEL TRAINING PROVIDED WILL INCLUDE ANY UPDATES/REVISIONS TO THE CONTINGENCY PLAN.

SIGN: 

F-0400-09-68
REV 8/98

EMPLOYEE HAZARDOUS WASTE TRAINING

RECORDS

PERSONNEL MUST RECEIVE INITIAL TRAINING WITHIN SIX MONTHS AFTER THE DATE OF THEIR EMPLOYMENT OR ASSIGNMENT TO A JOB THAT IS RELATED TO THE MANAGEMENT OF HAZARDOUS WASTE. AFTER THE INITIAL TRAINING FACILITY PERSONNEL MUST BE TRAINED ANNUALLY.

EMPLOYEE NAME: _ DAVE SHOVE

JOB TITLE: MAINTENANCE DEP. SUPERVISOR

JOB DESCRIPTION:

MACHINE REPAIR
ELECTRICIAN
EQUIPMENT UPDATE
GENERAL MAINTENANCE

INITIAL TRAINING: MAY 06, 1996

ANNUAL TRAINING: NOV 11, 2003

TYPES AND AMOUNT OF TRAINING:

ON THE JOB TRAINING ON

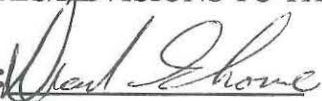
EMERGENCY SYSTEMS (COMMUNICATIONS & ALARMS)
EMERGENCY EQUIPMENT (WATER MAINS , GLOVES , BREATHING
APPARATUS, FIRE EXTINGUISHERS)
RESPONSE TO FIRES OR EXPLOSIONS
SHUT DOWN OPERATIONS
CONTINGENCY PLAN IMPLEMENTATION

ONE DAY CLASSROOM TRAINING ON

HAZARDOUS MATERIALS
RIGHT TO KNOW
CONFINED SPACES ENTRY
STORM WATER POLLUTION PREVENTION

NOTE: ANY PERSONNEL TRAINING PROVIDED WILL INCLUDE ANY UPDATES/REVISIONS TO THE CONTINGENCY PLAN.

SIGN:



EMPLOYEE HAZARDOUS WASTE TRAINING RECORDS

PERSONNEL MUST RECEIVE INITIAL TRAINING WITHIN SIX MONTHS AFTER THE DATE OF THEIR EMPLOYMENT OR ASSIGNMENT TO A JOB THAT IS RELATED TO THE MANAGEMENT OF HAZARDOUS WASTE. AFTER THE INITIAL TRAINING FACILITY PERSONNEL MUST BE TRAINED ANNUALLY.

EMPLOYEE NAME: JOHN DEAN

JOB TITLE: WASTE TREATMENT TECHNICIAN

JOB DESCRIPTION:

DAILY EFFLUENT ANALYSIS
DAILY FILTER CAKE DUMPING
FILTER CAKE DRYING
INSPECTION OF ROLL OFF WEEKLY
WASTE TREATMENT CHEMICAL MAKE UP
TRANSFERRING HAZARDOUS WASTE TO THE ROLL OFF BOX
RIGHT- TO - KNOW LAW
HANDLING OF HAZARDOUS MATERIALS

INITIAL TRAINING: DEC 09, 1995

ANNUAL TRAINING: NOV 11, 2003

TRAINED BY: ENVIRONMENTAL MANAGER

TYPES AND AMOUNT OT TRAINING: THE ABOVE EMPLOYEE HAS BEEN TRAINED FOR THREE (3) MONTHS ON THE FOLLOWING TOPICS.

EMERGENCY PROCEDURES
EMERGENCY SYSTEMS (SUCH AS COMMUNICATION SYSTEMS)
RESPONSE TO FIRES OR EXPLOSIONS
CONTINGENCY PLAN
SLUG/SPILL PREVENTION PLAN
MATERIAL SAFETY DATA SHEETS
STORM WATER POLLUTION

NOTE: ANY PERSONNEL TRAINING PROVIDED WILL INCLUDE ANY UPDATES/REVISIONS TO THE CONTINGENCY PLAN.

SIGN:

04-09-168-AF
REV 8/1998

EMPLOYEE HAZARDOUS WASTE TRAINING

RECORDS

PERSONNEL MUST RECEIVE INITIAL TRAINING WITHIN SIX MONTHS AFTER THE DATE OF THEIR EMPLOYMENT OR ASSIGNMENT TO A JOB THAT IS RELATED TO THE MANAGEMENT OF HAZARDOUS WASTE. AFTER THE INITIAL TRAINING FACILITY PERSONNEL MUST BE TRAINED ANNUALLY.

EMPLOYEE NAME: AURTHER ROBERSON

JOB TITLE: WASTE TREATMENT TECHNICIAN

JOB DESCRIPTION:

DUMP FILTER CAKE FROM FILTER PRESS
DRY FILTER CAKE
SWEEP AROUND WASTE TREATMENT
TRANSFER FILTER CAKE TO ROLL-OFF BOX
INSPECT MIXERS ON THE WASTE TREATMENT
GENERAL HOUSEKEEPING

INITIAL TRAINING: APRIL 24, 2002

ANNUAL TRAINING: NOV 11, 2003

ANNUAL TRAINING: TYPES AND AMOUNT OF TRAINING:

AUTHER HAD 2 MONTHS ON THE JOB TRAINING ON THE
EMERGENCY PROCEDURES

COMMUNICATIONS

CONTINGENCY PLAN

SLUG/SPILL PREVENTION PLAN

ONE DAY CLASSROOM INSTRUCTIONS VIDEOS ON

HOW TO HANDLE HAZARDOUS MATERIALS

CONFINED SPACES.

MATERIAL SAFETY DATA SHEETS

STORM WATER POLLUTION PREVENTION

NOTE: ANY PERSONNEL TRAINING PROVIDED WILL INCLUDE ANY
UPDATES/REVISIONS TO THE CONTINGENCY PLAN.

SIGN:

04-09-168-AP
REV 8/98

Aurther Roberson

Attachment F

Apollo Plating, Inc.

Title: **Hazardous Waste Management Training**

Revision Number: **00**

Document Number: **03-09-421-AP**

Date: 4/8/04

Approved: Environmental Manager

SYLLABUS OF HAZARDOUS WASTE MANAGEMENT TRAINING

40 CFR 261.3, 261.4(b), 261.24 and 262.11 – Facilities that generate solid waste must determine if the waste is hazardous waste.

40 CFR 261.5 – Generators of no more than 100 kg per month of hazardous waste or 1 kg of acutely hazardous waste may qualify as a Conditionally Exempt Small Quantity Generator (CESQG) when they meet specific requirements.

40 CFR 262.34(d)(1)(4) , 262.34(e)(f) – Generators of more than 100 kg, but less than 1,000 kg, of hazardous waste per month, shall qualify as a Small Quantity Generator (SQG), which can accumulate hazardous waste on-site for 180 days (or 270 days) without a permit if specific conditions are met.

40 CFR 262.12(a)(b) and 265.11 – SQG's that generate, transport, or handle hazardous waste must obtain an EPA identification number.

40 CFR 262.12(a)(b) – Large Quantity Generator (LOQ). A generator that generates, transports, or handles hazardous waste must obtain an EPA identification number.

40 CFR 262.34(a)(2)(3) and 262.34(b) – Generators may accumulate hazardous waste on-site for 90 days or less without a permit or interim status provided they meet certain conditions.

40 CFR 262.12(c) – Generators must not offer their waste to transporters or a Treatment Storage Disposal Facility (TSDF) that have not received an EPA identification number.

40 CFR 262.20, 262.40(a)(b)(d) and 262.42(a) – Generators are required to use manifests exception reports and maintain records.

40 CFR 262.40(c) - Generators are required to keep records of waste analyses, tests, and waste determinations.

40 CFR 262.34(a)(4), 265.30-265.37 – Generator storage areas must be designed, constructed, maintained, and operated to minimize the possibility of a fire, explosion or any unplanned release of hazardous waste or constituents, which could threaten human health or the environment.

PERSONNEL TRAINING

40 CFR 262.34(a)(4), 265.16(a)-(c) – All facility personnel who handle hazardous waste must meet certain training requirements:

- Identification of hazardous wastes

- Container use, marking, labeling, and on-site transportation

- Manifesting and off-site transportation

90 day storage area management
Personnel health and safety, and fire safety

The training program includes contingency plan implementation and is designed to ensure that facility personnel are able to respond to emergencies, including:

Procedures for using, inspecting, repairing and replacing emergency and monitoring
Equipment
Operation of communications and alarm systems
Response to fire or explosion
Response to ground water contamination incidents
Response to leaks or spills
Shutdown of operations

40 CFR 262.34(a), 265.16(d)(e) – Training records must be maintained for all facility staff who manages hazardous waste.

CONTINGENCY PLANS AND EMERGENCY COORDINATOR

40 CFR 262.34(a)(4), and 265.50-265.54 – Generators must have a contingency plan.

40 CFR 262.34(1)(4) and 265.55 – Each generator must have an emergency coordinator on the facility premises or on call at all times.

40 CFR 262.34(a)(4) and 265.56(a)-(i) – Emergency coordinators at generators must follow certain emergency procedures whenever there is an imminent or actual emergency situation.

40 CFR 262.34(a)(4) and 265.56(j) – Generator operators must record the time, date and details of any incident that requires implementing the contingency plan.

CONTAINERS

40 CFR 261.7 – Empty containers at generators previously holding hazardous waste must meet the regulatory definition of empty before they are exempted from hazardous waste requirements.

40 CFR 262.34(a)(1)(i) and 265.172 – Containers used to store hazardous waste at generators must be in good condition and not leaking. Containers used at generators must be made of or lined with materials compatible with the waste stored in them.

40 CFR 262.34(a)(1)(i) and 265.173 – Containers must be closed during storage and handled in a safe manner at generators.

40 CFR 262.34(a)(1)(i) and 265.177 – The handling of incompatible wastes and materials in containers at generators must comply with safe management practices. Containers used to store hazardous waste at generators should be managed in accordance with specific Management Practices (MP).

REFERENCES

QUALITY RECORDS

INTEGRATED ENVIRONMENTAL, INC.

Certificate of Achievement

This Is To Certify That:

Argyri P. Ioannou

has completed the following course:

**RCRA/Part 111 Compliance and Right-To-Know
Training Course for Metal Finishers**

August 4, 1998

Date


Instructor, Rick P. Harding, Ph.D.

Attachment G



REGISTRATION FORM

REGISTRATION FEE = \$50
Includes continental breakfast,
lunch, workshop materials, and
WREception.

CANCELLATION DEADLINE

October 30, 2003

CANCELLATION POLICY

Cancellations after October 30th or
no-shows will still be responsible
for the registration fee and will be
invoiced.

PAYMENT

Make checks payable to:

STATE OF MICHIGAN. Mail or
fax registration and mail fee to:

Marlene Osborne

Environmental Science and
Services Division

Michigan Department of
Environmental Quality

P.O. Box 80457

Lansing, Michigan 48909-7957

Fax: 517-335-4729

Email: osbornem@michigan.gov

*We are unable to accept credit
card payments.

Name & Title: Argyri Ioannou Environmental Mgrs

Company: Apollo Plating, Inc.

Address: 15765 Sturgeon

City/State/Zip Code: Roseville MI 48066

Business Phone: (586) 777-0070

Email Address: nonresponsive

Those providing an Email Address will receive additional information about the workshop.

Special Dietary Needs:

PLEASE CHECK THE BOX THAT BEST DESCRIBES YOUR
COMPANY OR ORGANIZATION:

- | | |
|---|--|
| <input type="checkbox"/> Business/trade association | <input type="checkbox"/> Manufacturing (SIC Code _____) |
| <input type="checkbox"/> Educational institution | <input type="checkbox"/> Safety/health organization |
| <input type="checkbox"/> Environmental consultant | <input type="checkbox"/> State government |
| <input type="checkbox"/> Environmental group | <input type="checkbox"/> Utility |
| <input type="checkbox"/> Local government | <input checked="" type="checkbox"/> Other <u>Electroplater</u> |

COMPANY SIZE (please check one):

- ☐ 1-50 employees
☒ 51-150 employees
☐ 151 to 250 employees
☐ 251 to 500 employees
☐ Over 500 employees

Please select the breakout sessions you plan to attend (one per time period).

Time	DfE	Recycling	Energy Efficiency	Land Use	Expo
9:15 am	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
10:15 am	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
11:15 am	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Water Conservation	Sustainability	Energy Efficiency	Green Facility	Expo
1:00 pm	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2:00 pm	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3:00 pm	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3:45 pm	<input type="checkbox"/> Check here to attend the WREception with Expo participants, co-sponsors, and attendees				

Facility Information & Directions

- The workshop will be held on Wednesday, November 5, 2003, at the **Burton Manor, 27777 Schoolcraft Road, Livonia, Michigan**. Free parking is available on-site.
- From the East:** I-96 West (Jeffries Fwy.). Exit 177 (Inkster Road). Merge onto Schoolcraft Road (service drive) going west. Through the light then left onto Cardwell Street. Burton Manor entrance is directly across.
- From the West:** I-96 East. Exit 176 (Middlebelt Road). Merge onto Schoolcraft Road (service drive). Burton Manor will be on the right, 3/4 mile east of Middlebelt.
- From Detroit Metro Airport:** Take I-94 West, exit I-275 North. Exit I-96 East. Follow directions from the West.

Hotel Information & Directions

- A block of rooms has been reserved at the **Comfort Inn Live 29235 Buckingham, Livonia, Michigan**, until October 21, 2003, at a rate of \$79 plus taxes under Group Code: MDEQ. Call 734-458-7111 to make reservations.
- Take I-96 to Exit 176 (Middlebelt Road). Merge onto Schoolcraft Road. Turn left onto Middlebelt Road. Olive Garden and Chi-Chi's restaurants are on the northeast corner. Turn right onto Buckingham, (located next to Olive Garden). Hotel is on right side.

If you have a disability which requires special accommodations at the workshop facility, please notify Mary Goodhall at 517-241-7968 a week in advance.

Attachment H

C&K SYSTEMS, INC.

Attachment I

Invoice

42408 MOUND ROAD
STERLING HEIGHTS, MI
48314

DATE	INVOICE #
12/12/2003	1764

BILL TO

APOLLO PLATING INC.
TODD MCNULTY
15765 STURGEON STREET
ROSEVILLE, MI 48066

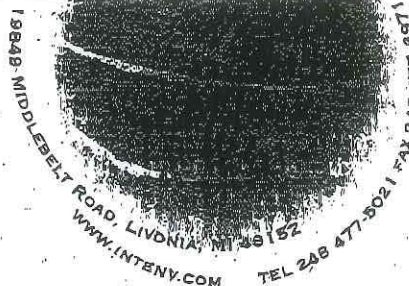
SHIP TO

APOLLO PLATING INC.
TODD MCNULTY
15765 STURGEON STREET
ROSEVILLE, MI 48066

P.O. NUMBER	TERMS	REP	SHIP	VIA	F.O.B.	PROJECT
VERBAL	Due on receipt			C&K		
QUANTITY	ITEM CODE	DESCRIPTION			PRICE EACH	AMOUNT
10	Boxes	4' and 8' Bulb Boxes. Sales Tax			4.00 0.00	40.00 0.00
KS FOR THE ORDER.					Total	\$40.00

POSTED
1/9/04

Attachment J



June 11, 2004

Apollo Plating, Inc.
15765 Sturgeon
Roseville, Michigan 48066

Attention: Argyi P. Ioannou
Environmental Manager

Regarding: RCRA Training

Dear Ms. Ioannou:

Per our June 10, 2004 telephone conversation, Integrated Environmental, Inc. (Integrated) is pleased to provide Apollo Plating, Inc. (Apollo) with this cost estimate for completion of training that satisfies the requirements for large quantity generators pursuant to the Resource Conservation and Recovery Act (RCRA). It is Integrated's understanding that 10 Apollo employees will be attending the training which is to take place at your facility between July 6 and July 16, 2004. Additionally, Integrated will provide one master copy of the training material handouts for Apollo to copy and distribute to the training attendees.

Integrated will conduct the training as described above for the lump sum amount of \$1,000.

Should you have any questions, please feel free to contact Integrated at (248) 477-5021.

Very truly yours,

INTEGRATED ENVIRONMENTAL, INC.

Rick P. Harding, Ph.D.
Senior Principal

Jason A. McHugh, CHMM
Project Manager

cc: File



INTEGRATED ENVIRONMENTAL, INC.



Photo 1

D-002



Photo 2

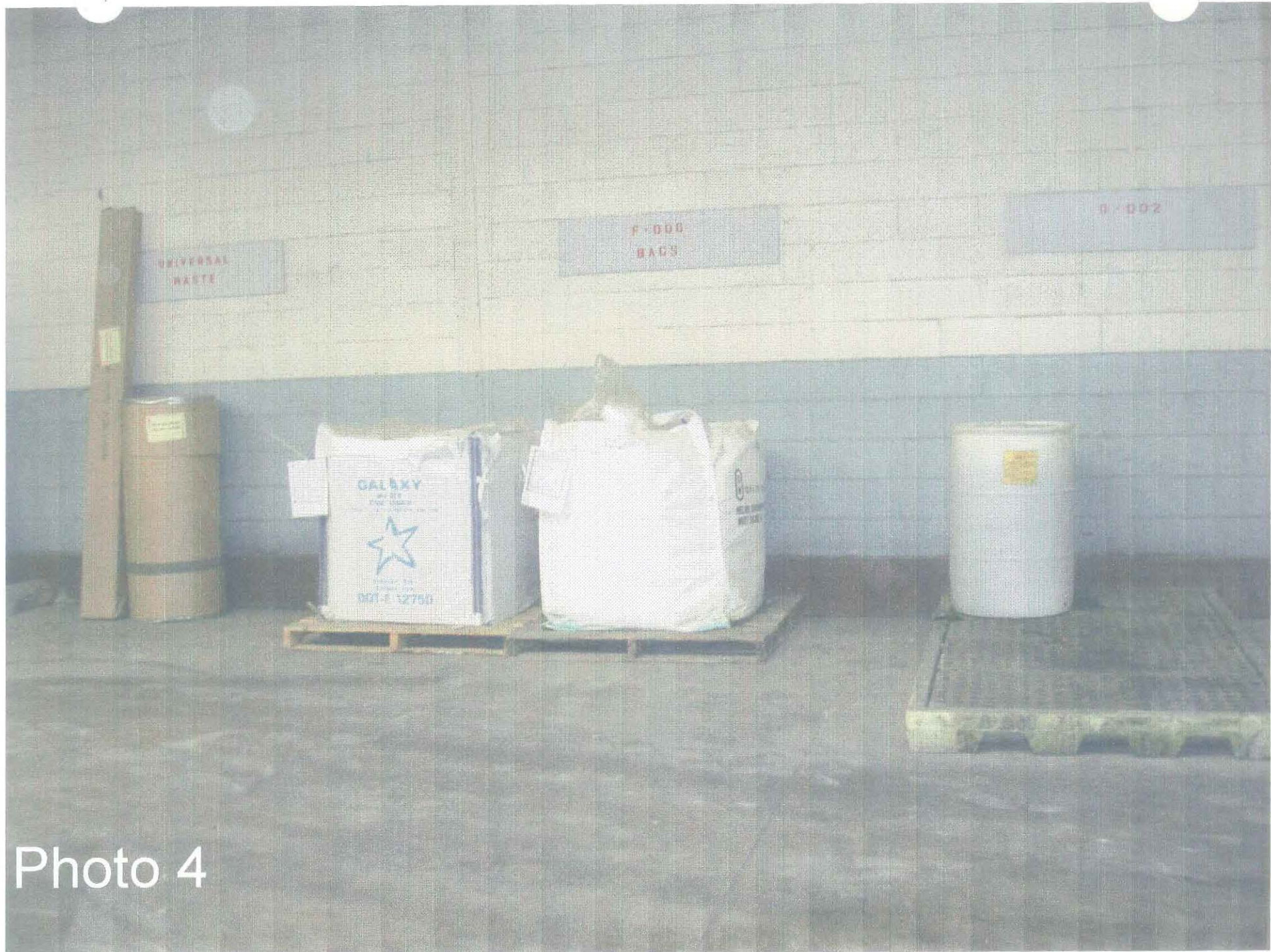
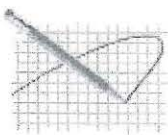


Photo 4



Sandra Lee/R5/USEPA/US

05/27/04 02:58 PM

To Bryan Gangwisch/R5/USEPA/US@EPA

cc

bcc

Subject Re: Apollo NOV/3007 

brian--i concur iwth the issuance of the NOV/3007 to Apollo. please make the following corrections:

- delete the statement of a **violation** in par. 1 or cite to that the requirement is also one for o/o of haz waste storage facilities
- include a statement of violation at the end of par. 3: **Apollo therefore has failed to comply with the above-referenced conditions for a license exemption, and has violated the storage facility ----- requirements.**
- include a statement of violation of the handler requirement at the end of par. 5
- delete references to Albar/Lapeer in the 3007. sandra

Bryan Gangwisch/R5/USEPA/US

Bryan
Gangwisch/R5/USEPA/US

05/10/2004 11:11 AM

To

Subject Apollo NOV/3007

Hi Sandra,

This is a LQG in MI, Apollo Plating, Inc., also attached is the inspection report for your reference, thanks



Apolloinspreport.wpd ApolloNOV05062004.wpd

Bryan Gangwisch
Environmental Scientist
Voice # (312) 886-0989
Fax # (312) 353-4342
gangwisch.bryan@epa.gov

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604-3590

MEMORANDUM

DATE: April 7, 2004

TO: Argyri Ioannou, - Environmental Manager
Apollo Plating, Inc.

FROM: Bryan Gangwisch, Environmental Scientist,
Waste, Pesticides and Toxics Division
Enforcement and Compliance Assurance Branch
Compliance Section #2

SUBJECT: Inspection Report for April 7, 2004, Compliance Evaluation Inspection of Apollo Plating, Inc., MID 052 035 425, a Large Quantity Generator located in Roseville, Michigan

A Compliance Evaluation Inspection (CEI) of the Apollo Plating, Inc., facility located at 15765 Sturgeon Road, Roseville, Michigan, was conducted on April 7, 2004. Present for this inspection were the following people:

Todd McNulty, Quality & Risk Manager	Apollo Plating, Inc.
Argyri Ioannou, Environmental Manager	Apollo Plating, Inc.
Mark Daniels, Environmental Quality Analyst	MDEQ
Bryan Gangwisch, Environmental Scientist	U.S. EPA

This facility which is located at 15765 Sturgeon Road was originally constructed in 1969. Apollo Plating, Inc., has performed operations throughout the entire existence of this facility. Apollo performs three types of plating processes and a nickel-stripping operation. Mr. McNulty stated that the legal ownership and operator has not changed and is still Jim Grimes Sr. This facility has always been used for the plating process. Presently this facility employs about 130 people and operates 3 manufacturing shifts, 24 hours per day. One of Apollo Plating's processes involve alkaline zinc plating over cold-rolled steel, nickel-chrome line over stainless and cold-rolled steel, and chrome flash over stainless steel.

The main waste streams generated at Apollo consists of electroplating sludge from the wastewater treatment process (F006), and spent acid from the stripping operation (D002). Other waste streams generated are spent waste fluorescent bulbs and used oil which gets mixed with hazardous waste. Most of the waste streams are managed in 55 gallon containers, cubic yard

bags, in a cubic yard box, and in a roll-off box. Mr. McNulty stated that an annual decant of the tanks on the zinc line takes place and the waste is toted or drummed.

This facility consists of one building that is involved with the generation and storage of hazardous waste, along with universal waste (fluorescent light bulbs) and generated used oils. The make-up of the facility includes office space, general storage area, plating lines, and a wastewater treatment system.

A walk-through of the facility was conducted at this time.

The General Storage Area contained four (4) cubic yard bags, which were designated as a hazardous waste storage area for less than 90 days, as stated by Ms. Ioannou. Each bag was closed and labeled as "hazardous waste", "F006", and all the bags were marked with an accumulation date that was less than 90 days old from the date of this inspection. The oldest marked date was 2/24/04. The bags contained no free liquid, but were still contained on pallets. A spill control kit was nearby along with a telephone and a fire extinguisher.

At the wastewater treatment system, there was a cubic yard container (hopper) that contained the filter cake "F006" waste. Ms. Ioannou stated that at this satellite area, the container was filled and moved daily to a less than 90-day roll-off box outside. The container was labeled as "hazardous waste", and "F006". A lid that could be manually removed/replaced was present on the container (hopper). The wastewater is discharged to the Detroit Water and Sewerage Department pursuant to a permit that will expire on 3/1/08.

The Chemical Drum Storage Area, was also designated as a less than 90-day hazardous waste storage area, as stated by Ms. Ioannou. There were four (4) 55-gallon drums that contained waste resulting from the cleaning of the zinc line. One drum that was labeled as "hazardous waste", "D002", and was dated 1/20/04, was designated as a satellite accumulation area because it was not filled as stated by Ms. Ioannou. The satellite drum was closed at this time. The other three drums that were designated less than 90 day storage were labeled as "hazardous waste", "D002", and dated 3/20/04; 3/22/04; and 3/27/04. The three storage drums were closed at this time. The labels however were not easily inspected and aisle space was not sufficient. This storage area was situated upon an impervious surface with no cracks or gaps, and the three storage drums were elevated on pallets. There was no secondary containment for these drums that contained free liquid. A spill control kit was nearby along with a telephone and a fire extinguisher.

O v10

The third designated less than 90-day hazardous waste storage area, consisted of a Roll-Off Box (ROB) that was situated outside. The ROB was labeled as "hazardous waste", "F006", and was dated 4/2/04. Ms. Ioannou stated that the ROB that received the filter cake daily from the cubic yard container (hopper), was shipped out approximately once per month. A spill control kit was nearby along with a telephone and a fire extinguisher. This storage area contained no free liquids and the ROB was securely covered with a waterproof tarp. The ROB was also protected from vandals at its outside position and the surface it was situated on was impervious with no cracks or gaps.

add 7 weather

0 wo

The General Storage Area had three (3) 55-gallon drums of used fluorescent bulbs that were not properly contained, and the drums did not have any labels or dates on them. Pictures were taken of these waste bulbs. Mr. McNulty stated that the waste bulbs get disposed about once per year and get recycled.

The facility possessed a public address system, internal alarm, adequate number of fire extinguishers, adequate number of spill control kits, and all supervisors carry Nextel phones.

A records review was conducted at this time.

Manifests are kept on-site for at least 3 years. The most recent manifests show that waste is sent to the following TSDF's: Dynecol, Inc., (MID074259565); and World Resources Company (PAD981038227). The manifests are signed by Dave Shove and Ms. Ioannou. The manifests all had the appropriate land disposal restrictions attached. Copies (generator and TSD) were being forwarded to the MDEQ in Lansing, Michigan.

Inspections of the 90-day hazardous waste storage areas are conducted on a weekly basis. Inspections are conducted by Ms. Ioannou. Apollo maintains inspection logs for at least three years.

Waste determinations are done through Dynecol in Michigan and World Resources in Pennsylvania, or by generator knowledge.

Personnel training for all employees involved in the production/waste handling process has been taking place. According to Ms. Ioannou, she formulates the policies and then trains employees by leading them on a thorough walkthrough of the waste handling procedures specific to Apollo. Apollo was ensuring that all employees are properly trained and thoroughly familiar with emergency procedures as stated by Ms. Ioannou, but there were no records or documentation of a training syllabus provided. Ms. Ioannou did possess an 8 hour refresher that was current, but had no other documentation that she was trained for RCRA management. The training is done by Ms. Ioannou.

The contingency plan contained the following information: emergency coordinators and telephone numbers, list of safety and spill control equipment, facility schematic, evacuation routes, response policy for fire, smoke, and telephone numbers for fire and police departments, hospital, and MDEQ. Arrangements and notifications had been made with local fire, police, and hospitals in case of any emergencies.

Apollo's practice of waste minimization is as follows: Mr. McNulty stated that Apollo does not have a written plan, but is very conscious in making every effort to minimize waste through using a water recycling system which in turns saves on chemicals.

The inspection was concluded at this time.

Documents received during this inspection are as follows:

- Facility schematic of the facility
- A copy of a letter confirming Apollo's wastewater discharge permit is current

Documents given to Apollo during this inspection are as follows:

- U.S. EPA Small Business Resources handout (compliance assistance)

Documents received since the date of this inspection (4/7/04) are as follows:

- None

Attachments:

- A MDEQ Large Quantity Generator (LQG) inspection checklist
- A photo log of the inspection consisting of the following four (4) photos:
 - picture # 1
 - picture # 2
 - picture # 3
 - picture # 4

HAZARDOUS WASTE INSPECTION



July 10, 1998 ID#: 4M10 052 035 425

Facility's Name: Apollo Plating Inc.

Facility Location Address: 15765 Sturgeon

City: Roseville Zip: 48066 County Name: Macomb

WASTE CODE	PROCESS WASTE IS GENERATED FROM
D002/7/8/0010/0030	Nitric acid spirit strip soln.
F006	waste filter press cake from waste → electroplating

Reason for the Inspection: ☒ Routine ☐ Follow-up ☐ Complaint

PERSON(S) INTERVIEWED	TITLE	TELEPHONE NUMBER
Arguri Ioannou	Environmental Mgr.	810 777 0070
Jed McNeely	VP Engineering	" "

INSPECTOR(S) NAME	AGENCY	TELEPHONE NUMBER
J M Noechel	DEQ	313 392 6524

Primary business of the facility: Electroplaters

Does the facility discharge a process wastewater to the local POTW that would otherwise be a RCRA regulated hazardous waste? ☐ no ☐ yes
If yes send a copy of this cover sheet to SWQD)

DWSD permit # 021-001

expires 3/1/99

Is the facility subject to air emission standards for process vents managing hazardous waste with organic concentrations of at least 10 ppmw? If yes, circle the type of

operation(s): distillation fractionation thin-film evaporation solvent extraction air or stream stripping (if yes send a copy of this cover sheet to AQD)

not observed.

Based upon the inspection this facility was inspected as a:

check forms used	GENERAL CATEGORIES OF FACILITIES
	conditionally exempt small quantity generator
	small quantity generator
	small quantity generator tank system
✓	generator
	generator tank system
	transporter
	boiler and/or industrial furnace
	wood preserver
	small quantity handler
	large quantity handler

check forms used	PERMITTED OR INTERIM TREATMENT, STORAGE, DISPOSAL FACILITIES
	permitted general treatment, storage or disposal facility
	interim general treatment, storage or disposal facility
	generator (appendix)
	tank system
	permitted surface impoundment
	permitted waste pile
	permitted land treatment
	permitted landfill
	miscellaneous units
	permitted organic air emissions from process vents
	permitted organic air emissions from equipment leaks
	interim groundwater monitoring (use with Subparts K,L,M & N)
	interim surface impoundment
	interim waste pile
	interim land treatment
	interim landfill
	interim chemical, physical & biological treatment
	interim organic air emissions from process vents
	permitted organic air emissions from equipment leaks

GENERATOR INSPECTION FORM

Facility's Name Apollo Plating Inc.
 Date 8/5/98 ID# 4M12 052 035 425

Part 3 Rules

1994 PA 451

HAZARDOUS WASTE AND WASTE #	SOURCE	HOW MUCH
	<i>See Cover sheet</i>	

(rev. 01/29/97 - EAB)

☒ abbreviated

FACILITY COMPLIANCE REQUIRED IN ALL AREAS

NI - Not Inspected N/A - Not Applicable

YES NO NI N/A

WASTE DETERMINATION (Rule 302: 40 CFR 262.11)

1. Determined if waste streams are hazardous waste? (Rule 302: 40 CFR 262.11)	GGR	<input checked="" type="checkbox"/> NI N/A
a) Copy of waste evaluation on-site 3 years? (Rule 307(1): 40 CFR 262.40(c)) <i>quoting char for nitric acid stripper</i>	GRR	<input type="checkbox"/> <input checked="" type="checkbox"/> NI N/A
b) Re-evaluated waste when changes in materials or process? (Rule 302(3))	GGR	<input type="checkbox"/> <input checked="" type="checkbox"/> NI N/A

IDENTIFICATION NUMBER (Rule 303: 40 CFR 262.12)

2. Has the generator obtained an identification number? (Rule 303: 40 CFR 262.12)	GGR	<input checked="" type="checkbox"/> NI N/A
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MANIFEST REQUIREMENTS (Rule 304: 40 CFR 262.20)

3. Copies of the manifest readily available for review & inspection (matched)? (Section 11138(1)(f))	GMR	<input checked="" type="checkbox"/> NI N/A
4. Manifests kept for the past 3 years? (Rule 307(3): 40 CFR 262.40(a))	GMR	<input checked="" type="checkbox"/> NI N/A
5. Manifests, prepared by the generator (Rule 304(1)(a): 40 CFR 262.20(a)), contain the following?	GMR	NI N/A
a) Manifest document number. (Rule 304(2)(a): 40 CFR 262.20(a))	GMR	<input checked="" type="checkbox"/> NI N/A
b) Generator's name, address, phone & ID # (Rule 304(2)(b): 40 CFR 262.20(a))	GMR	<input checked="" type="checkbox"/> NI N/A
c) Name & ID # of the transporter. (Rule 304(2)(c): 40 CFR 262.20(a))	GMR	<input checked="" type="checkbox"/> NI N/A
d) Name, address & ID # of TSDF. (Rule 304(2)(d): 40 CFR 262.20(b)&(c))	GMR	<input checked="" type="checkbox"/> NI N/A
e) DOT description of waste(s). (Rule 304(2)(e): 40 CFR 262.20(a))	GMR	<input checked="" type="checkbox"/> NI N/A
f) Quantity of waste, type & # of containers. (Rule 304(2)(f): 40 CFR 262.20(a))	GMR	<input checked="" type="checkbox"/> NI N/A
g) Hazardous waste number of the wastes. (Rule 304(2)(g): 40 CFR 262.20(a)) <i>ADD waste codes? comment</i>	GMR	<input checked="" type="checkbox"/> NI N/A
h) Generator signature, initial transporter & date of acceptance? (Rule 304(4)(a)&(b): 40 CFR 262.23(a)(1)&(2))	GMR	<input checked="" type="checkbox"/> NI N/A
6. Submitted copy of manifests to director no later than 10 days after month shipment was made? (Rule 304(4)(d))	GMR	<input checked="" type="checkbox"/> NI N/A
7. Is the transporter used properly licensed under Act 451, Part 111? (Rule 304(1)(c))	GPT	<input checked="" type="checkbox"/> NI N/A

NOTE: For shipments of hazardous waste solely by water or rail shipments, within United States see Rule 304(4)(f or g).

Using manifest that has expired? (Rule 304(2): 40 CFR 262.20(a))	GMR	<input checked="" type="checkbox"/> NI N/A
Reportable exceptions. (Rule 308(3): 40 CFR 262.42)		
a) Number of manifests generator HASN'T receive signed copy from TSD w/in 35 days.	GRR	<input checked="" type="checkbox"/>
b) Manifests generator HASN'T submitted exception reports to RA & DEQ after 45 days.	GRR	<input checked="" type="checkbox"/>

		YES	NO	NI	N/A
10. Facility have written program to reduce volume/toxicity/recycle wastes? (Rule 304(2)(I):40 CFR 262.20(a))	GMR	<input type="checkbox"/>	<input checked="" type="checkbox"/>	NI	N/A
<i>mostly water flow restriction OR in waste min</i>					
11. Facility discuss program in place to reduce volume/toxicity/recycle of wastes? (Rule 304(2)(I): 40 CFR 262.20(a))	GMR	<input type="checkbox"/>	<input checked="" type="checkbox"/>	NI	N/A
<i>reserve judgement</i>					

WASTE ANALYSIS AND RECORDKEEPING (40 CFR 268.7)

12. Did the generator determine if the waste is restricted from land disposal? (40 CFR 268.7(a))					
a) All listed wastes?	GLB	<input checked="" type="checkbox"/>	<input type="checkbox"/>	NI	N/A
b) All characteristic wastes?	GLB	<input checked="" type="checkbox"/>	<input type="checkbox"/>	NI	N/A

NOTE: If waste has both listed & characteristic waste codes, the treatment standard for the listed waste is sufficient if the treatment standards for the listed waste includes a standard for the constituent that caused the waste to exhibit the characteristic, except for D001 and D002. (40 CFR 268.9(b))

13. If restricted waste exceeds treatment standards or prohibitions did notice go w/ each shipment? (40 CFR 268.7(a)(1))	GLB	<input checked="" type="checkbox"/>	<input type="checkbox"/>	NI	N/A
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OR

14. If restricted waste does not exceed treatment standards or prohibitions did a notice and certification statement go with each shipment? (40 CFR 268.7(a)(2))	GLB	<input type="checkbox"/>	<input type="checkbox"/>	NI	N/A
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OR

15. If waste has exemption from prohibition on the type of land disposal method utilized for the waste, did a notice go with each shipment? (40 CFR 268.7(a)(3))	GLB	<input type="checkbox"/>	<input type="checkbox"/>	NI	N/A
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OR

16. If facility choose alternative treatment standard for lab pack that contains none of the waste in appendix IV, did a notice & certification go w/ each shipment? (40 CFR 268.7(a)(8))	GLB	<input type="checkbox"/>	<input type="checkbox"/>	NI	N/A
17. Did the notice include: (40 CFR 268.7(a)(1)(I-v) or 268.7(a)(2)(I)(A-D) or 268.7(a)(3)(I-iv)					
a) EPA hazardous waste #?	GLB	<input checked="" type="checkbox"/>	<input type="checkbox"/>	NI	N/A
b) If wastewater or non-wastewater as defined in 268.2(d&f)?	GLB	<input checked="" type="checkbox"/>	<input type="checkbox"/>	NI	N/A
c) Subcategory of the waste (such as D003 reactive cyanide) if applicable?	GLB	<input checked="" type="checkbox"/>	<input type="checkbox"/>	NI	N/A
d) Manifest number associated with the shipment?	GLB	<input checked="" type="checkbox"/>	<input type="checkbox"/>	NI	N/A
e) Waste analysis data, where available? <i>faxed. Not on site</i>	GLB	<input type="checkbox"/>	<input checked="" type="checkbox"/>	NI	N/A
f) Waste constituents that the treater will monitor, if monitoring will not include all regulated constituents, for F001 - F005, F039, D001, D002, D012-D043? (treatment standards for hazardous waste in table in 268.40 for the waste code under regulated constituents)	GLB	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	NI	N/A
<i>UHC ✓ d but not listed</i>					

UNLESS

g) Did generator/treater claim they are going to monitor for ALL regulated constituents in the waste in lieu of the generator indicating same in the notice? (40 CFR 268.7(a)(1)(ii))	GLB	<input type="checkbox"/>	<input type="checkbox"/>	NI	N/A
h) Underlying hazardous waste constituents (except vanadium and zinc), reasonably be expected to be present at the generation point, above UTS standards for D001, D002 & TCLP organics? (40 CFR 268 Subpart D & 268.48)	GLB	<input type="checkbox"/>	<input type="checkbox"/>	NI	N/A
18. Other than notices for waste exceeding treatment standards, did notices include:					
a) If the notice is for shipments that meet the standards does the notice include the certification?	GLB	<input type="checkbox"/>	<input type="checkbox"/>	NI	N/A
b) If the notice is for shipments under prohibitions does the notice include a statement that the waste isn't prohibited from land disposal & date the waste is subject to prohibition?	GLB	<input type="checkbox"/>	<input type="checkbox"/>	NI	N/A

YES NO NI N/A

NOTE: An alternate treatment standard may be used after approval from the Administrator. (40 CFR 268.44)

NOTE: Hazardous waste debris see 40 CFR 268.7(a)(1)(iv) for the notice requirements which must be followed by the statement "This hazardous debris is subject to alternative treatment standards of 40 CFR 268.45."

19. Generator retain on-site records to support determination from knowledge or results from tests? (40 CFR 268.7(a)(5))	GLB	<input type="checkbox"/>	<input checked="" type="checkbox"/>	NI	N/A
20. If the restricted waste is excluded from being a hazardous waste or solid waste did the generator place a on-time notice stating same in the facility file? (40 CFR 268.7(a)(6))	GLB	<input type="checkbox"/>		NI	N/A
21. All notices/certifications/demonstrations/other documents retained for 5 years on-site? (40 CFR 268.7(a)(7))	GLB	<input checked="" type="checkbox"/>		NI	N/A

NOTE: This requirement (268.7(a)(7)) applies to solid waste even when the hazardous waste characteristic is removed prior to disposal or when the waste is excluded from the definition of hazardous waste or solid waste.

DILUTION PROHIBITED AS SUBSTITUTE FOR TREATMENT (40 CFR 268.3)

22. Generator dilute hazardous waste or treatment residue of a hazardous waste to avoid prohibition? (40 CFR 268.3(a))	GLB	<input checked="" type="checkbox"/>		NI	N/A
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TREATMENT STANDARDS (40 CFR 268.40)

23. If wastes exceeding treatment standards are mixed, was the most stringent standards selected? (40 CFR 268.40(c))	GLB	<input type="checkbox"/>		NI	N/A
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BIENNIAL REPORT (Rule 308: 40 CFR 262.41)

24. Generator submitted biennial report by 3/1 (even years)? (Rule 308(1): 40 CFR 262.41)	GRR	<input checked="" type="checkbox"/>		NI	N/A
25. Were copies of the report retained at least 3 years? (Rule 307(4): 40 CFR 262.40(b))	GRR	<input type="checkbox"/>		NI	N/A

PRE-TRANSPORTER REQUIREMENTS (Rule 305: 40 CFR 262.30)

26. Waste packaged according to DOT regulations (required before shipping waste off-site)? (Rule 305(1)(a): 40 CFR 262.30)	GPT	co. said <input checked="" type="checkbox"/> observed <input checked="" type="checkbox"/>		NI	N/A
27. Are waste packages marked & labeled according to DOT concerning hazardous materials (required before shipping waste off-site)? (Rule 305(1)(b)(c): 40 CFR 262.32(a))	GPT	co. said <input type="checkbox"/> observed <input checked="" type="checkbox"/>		NI	N/A
28. On containers 110 gallons or less, is there a warning, generator's name, address, manifest document # & waste code; 49 CFR 172.304? (Rule 305(1)(d): 40 CFR 262.32(b))	GPT	co. said <input type="checkbox"/> observed <input checked="" type="checkbox"/>		NI	N/A
29. If required, are placards available to the transporter? (Rule 305(1)(e): 40 CFR 262.33)	GPT	<input type="checkbox"/>		NI	N/A

ACCUMULATION TIME (Rule 306: 40 CFR 262.34)

30. If hazardous waste accumulated in containers: (If no, skip to #35)					
(a) Containers have accumulation date & visible? (Rule 306(1)(b): 40 CFR 262.34(a)(2))	GPT	<input type="checkbox"/>	<input checked="" type="checkbox"/>	NI	N/A
(b) Container have words "Hazardous Waste"? (Rule 306(1)(c): 40 CFR 262.34(a)(3))	GPT	<input type="checkbox"/>	<input checked="" type="checkbox"/>	NI	N/A
(c) Is each container clearly marked with the hazardous waste number? (Rule 306(1)(b))	GPT	<input type="checkbox"/>	<input checked="" type="checkbox"/>	NI	N/A
(d) Has more than 90 days elapsed since date marked? (Rule 306(1))	GPT	<input type="checkbox"/>		NI	N/A

UNLESS

e) The generator applied for & received an extension to accumulate longer? (Rule 306(3): 40 CFR 262.34(b))	GPT	<input type="checkbox"/>		NI	N/A
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The following Subpart I, 265.170 to 265.177 requirements are referred to by Rule 306(1)(a) and 40 CFR 262.34(a)(1).

f) Are containers in good condition? (265.171)	GMC	<input checked="" type="checkbox"/>		NI	N/A
g) Are containers compatible with waste in them (265.172)	GMC	<input checked="" type="checkbox"/>		NI	N/A
h) Are containers stored closed? (265.173(a))	GMC	<input type="checkbox"/>	<input checked="" type="checkbox"/>	NI	N/A

		YES	NO	NI	N/A
f) Containers handled/stored in a way which may rupture it or cause leaks? (265.173(b))	GMC	<input checked="" type="checkbox"/>		NI	N/A
g) Ignitable & reactive wastes stored 15 meters (50 feet) from property line? (265.176)	GMC	<input type="checkbox"/>		NI	N/A
h) Are containers inspected weekly for leaks and defects? (265.174)	GMC	<input checked="" type="checkbox"/>		NI	N/A
i) Did the generator document the inspections in 30(k)? (Rule 306(1)(a)(I))	GMC	<input type="checkbox"/>	<input checked="" type="checkbox"/>	NI	N/A
j) Inspection documents maintained on-site 3 years? (Rule 306(1)(a)(I))	GMC	<input type="checkbox"/>	<input checked="" type="checkbox"/>	NI	N/A
k) Are incompatible wastes stored in separate containers? (265.177(a))	GMC	<input type="checkbox"/>		NI	N/A
l) Hazardous wastes put in unwashed containers that previously held incompatible waste. (265.177(b))	GMC	<input type="checkbox"/>		NI	N/A
m) Incompatible waste separated/protected from each other by physical barriers or sufficient distance? (265.177(c))	GMC	<input type="checkbox"/>		NI	N/A
31. If hazardous waste is being accumulated at the point of generation:					
a) Container(s) < 55 gal or 1 qt acutely/severely toxic? (Rule 306(2): 40 CFR 262.34(c)(1))	GMC	<input type="checkbox"/>		NI	N/A
b) Container(s) under operator control & near the point of generation? (Rule 306(2): 40 CFR 262.34(c)(1))	GMC	<input type="checkbox"/>		NI	N/A
c) Container(s) have words "Hazardous Waste"? (Rule 306(2): 40 CFR 262.34(c)(1)(ii))	GMC	<input type="checkbox"/>		NI	N/A
d) Are the container(s) marked with the hazardous waste number? (Rule 306(2))	GMC	<input type="checkbox"/>		NI	N/A

Rule 306(2) & 40 CFR 262.34(c)(1)(I) both refer to 40 CFR 265.171, 265.172 & 265.173(a).

e) Are container(s) in good condition? (265.171)	GMC	<input type="checkbox"/>		NI	N/A
f) Are container(s) compatible with waste in them? (265.172)	GMC	<input type="checkbox"/>		NI	N/A
g) Container(s) closed when not in use & managed to prevent leaks? (265.173(a))	GMC	<input type="checkbox"/>		NI	N/A
32. If generator exceeded 55 gallons or 1 quart, w/in 3 days did generator, w/respect to that amount of excess waste: (Rule 306(2): 40 CFR 262.34(c)(2))					
a) Mark the container with the date the excess amount began accumulating?	GMC	<input type="checkbox"/>		NI	N/A
b) Move to an area with secondary containment?	GMC	<input type="checkbox"/>		NI	N/A

Rule 306(1)(a) refers to containment requirements in 40 CFR 264.175.

33. If accumulating free liquids or any F020, F021, F022, F023, F026, F027, does the hazardous waste storage area include: <i>not acc liquids - skipper</i> <i>public</i> <i>no acc. solids in can</i>					
a) Impervious base free of cracks? (264.175(b)(1))	GMC	<input type="checkbox"/>		NI	N/A
b) Sloped or otherwise designed to elevate/protect containers from contact with liquids? (264.175(b)(2))	GMC	<input type="checkbox"/>		NI	N/A
c) Hold 10% of volume of containers or volume of the largest container, whichever is greater? (264.175(b)(3))	GMC	<input type="checkbox"/>		NI	N/A
d) Run-on prevented unless sufficient capacity? (264.175(b)(4))	GMC	<input type="checkbox"/>		NI	N/A
e) Accumulated liquids removed in a timely manner to prevent overflow? (264.175(b)(5))	GMC	<input type="checkbox"/>		NI	N/A
34. If accumulating solids (other than F020, F021, F022, F023, F026, F027), is hazardous waste accumulation area sloped or otherwise designed, or containers elevated or otherwise protected from contact with liquids? (264.175(c))	GMC	<input checked="" type="checkbox"/>		NI	N/A

Closure of accumulation area(s) is under question 50.

35. Is hazardous waste accumulated in other than tanks or containers? Or, is hazardous waste generated but not accumulated, i.e.: process tank? Explain any yes answer. <i>periodic draining of no storage</i>					
36. Waste area protected from weather, fire, physical damage & vandals? (Rule 306(1)(e))	GMC	<input checked="" type="checkbox"/>		NI	N/A
37. Hazardous waste accumulated so no-hazardous waste or hazardous waste constituent can escape by gravity into soil, directly or indirectly, into surface, groundwaters, drains or sewers, and such that fugitive emissions do not violate Act-451, Part 552 (Rule 306(1)(f))	GMC	<input checked="" type="checkbox"/>		NI	N/A
38. Is hazardous waste accumulated in tanks? If so, complete Tank System inspection form.		<input checked="" type="checkbox"/>		NI	N/A
39. Is hazardous waste placed on drip pads? If so, complete Wood Preserving inspection form.		<input checked="" type="checkbox"/>		NI	N/A

YES NO NI N/A

Rule 306(1)(d) & 40 CFR 262.34(a)(4) refers to 265.16

PERSONNEL TRAINING (265.16)

40. Do personnel training records contain the following:			
a) Job title? (265.16(d)(1))	GPT	<input type="checkbox"/>	NI N/A
b) Job descriptions? (265.16(d)(2))	GPT	<input type="checkbox"/>	NI N/A
c) Name of employee filling each job? (265.16(d)(1))	GPT	<input type="checkbox"/>	NI N/A
d) Description of type & amount of both introductory & continued training? 265.16(d)(3))	GPT	<input type="checkbox"/>	NI N/A
<u>e</u>) Training designed so facility personnel can respond to emergencies? (265.16(a)(3))	GPT	<input checked="" type="checkbox"/>	NI N/A
<u>f</u>) Records of training? (265.16(d)(4))	GPT	<input checked="" type="checkbox"/>	NI N/A
g) Do new personnel receive required training within 6 months? (265.16(b))	GPT	<input type="checkbox"/>	NI N/A
h) Do training records show personnel have taken part in annual training? (265.16(c))	GPT	<input type="checkbox"/>	NI N/A
i) Training by person trained in haz. waste management procedures? (265.16(a)(2))	GPT	<input type="checkbox"/>	NI N/A

Rule 306(1)(d) & 40 CFR 262.34(a)(4) refer to 265, Subpart C, 265.30-265.37.

PREPAREDNESS AND PREVENTION (265.30-265.37)

41. Facility maintained/operated to minimize possibility of fire, explosion, release of hazardous waste or hazardous waste constituent which could threaten human health/environment? (265.31)	GPT	co. said <input type="checkbox"/> observed <input checked="" type="checkbox"/>	NI N/A
42. If required, does this facility have the following equipment:			
a) Internal communications or alarm systems? (265.32(a))	GPT	<input type="checkbox"/>	NI N/A
b) Telephone or 2-way radios at the scene of operations? (265.32(b))	GPT	<input type="checkbox"/>	NI N/A
c) Portable fire extinguishers, fire control, spill control equipment and decontamination equipment? (265.32(c))	GPT	<input type="checkbox"/>	NI N/A
d) Adequate volume of water and/or foam available for fire control? (265.32(d))	GPT	<input type="checkbox"/>	NI N/A
43. Testing and Maintenance of Emergency Equipment:			
a) Owner/operator test & maintain emergency equipment to assure operation? (265.33)	GPT	<input type="checkbox"/>	NI N/A

NOTE: Access to communication or alarm system is applicable only if required 40 CFR 265.32

b) Has owner/operator provided immediate access to internal alarms? (265.34(a)&(b))			
i) When hazardous waste is being poured, mixed, etc.	GPT	<input type="checkbox"/>	NI N/A
ii) One employee on the premises while facility is operating.	GPT	<input type="checkbox"/>	NI N/A
<u>c</u>) Aisle space for unobstructed movement of personnel/emergency equipment? (265.35)	GPT	<input checked="" type="checkbox"/>	NI N/A
44 Has the facility made arrangements with local authorities? (265.37(a)&(b))	GPT	<input type="checkbox"/>	NI N/A

Rule 306(1)(d) & 40 CFR 262.34(a)(4) refer to Subpart D, 265.50-265.56.

CONTINGENCY PLAN AND EMERGENCY PROCEDURES (265.50-265.56)

45. Plan implemented whenever fire/explosion/release could threaten human health or the environment? (265.51(b))	GPT	<input type="checkbox"/>	NI N/A
46. Does the contingency plan contain the following information:			
<u>a</u>) Actions personnel must take responding to fires/explosions/unplanned release of hazardous waste? (265.52(a)&(b))	GPT	<input checked="" type="checkbox"/>	NI N/A
<u>b</u>) Describe arrangements or attempts w/ local police, fire, hospitals, contractors, state & local emergency responders for emergency services; (265.52(c)) & (265.37(a)&(b))?	GPT	<input checked="" type="checkbox"/>	NI N/A
<u>c</u>) Name, addresses & phone (office & home) of emergency coordinator? (265.52(d))	GPT	<input checked="" type="checkbox"/>	NI N/A

			YES	NO	NI	N/A
d)	List emergency equipment at the facility, including location, physical description & capabilities? (265.52(e))	GPT	<input checked="" type="checkbox"/>		NI	N/A
e)	Evacuation plan for personnel w/ signal(s), evacuation routes & alternate evacuation routes. (265.52(f))	GPT	<input type="checkbox"/>	<input checked="" type="checkbox"/>	NI	N/A
47. Emergency Coordinator and Emergency Procedures:						
a)	Coordinator familiar with site operation & emergency procedures? (265.55)	GPT	<input type="checkbox"/>	<input checked="" type="checkbox"/>	NI	N/A
b)	Emergency coordinator have authority to carry out the contingency plan? (265.55)	GPT	<input type="checkbox"/>	<input checked="" type="checkbox"/>	NI	N/A
c)	If emergency occurred, did coordinator followed emergency procedures? (265.56)	GPT	<input type="checkbox"/>	<input checked="" type="checkbox"/>	NI	N/A
d)	Fire/explosion/other release of hazardous waste/haz. waste constituents, could threaten human health or environment or generator has knowledge spill reached surface or ground water, did generator notify MDEQ? (Rule 306(1)(d))	GPT	<input type="checkbox"/>		NI	N/A
48. Contingency plan Amendments and Copies:						
a)	Amended: fails in emergency; changes in regulations/emergency coordinators/emergency equipment? (265.54)	GPT	<input type="checkbox"/>	<input checked="" type="checkbox"/>	NI	N/A
b)	Copies of plan on site and sent to local emergency organizations? (265.53)	GPT	<input type="checkbox"/>	<input checked="" type="checkbox"/>	NI	N/A

Rule 309 refers to 262, Subpart E except 262.54 & 262.55

INTERNATIONAL SHIPMENTS (Rule 309 & 310: 40 CFR 262.50-262.60)

49.	Has the facility imported or exported hazardous waste?	GOR			NI	N/A
a)	Exporting, has the generator:	GOR			NI	N/A
i)	Notified the Administrator in writing? (262.52(a))	GOR	<input type="checkbox"/>		NI	N/A
ii)	Receiving country consented to accept waste. (262.52(b))	GOR	<input type="checkbox"/>		NI	N/A
iii)	Has copy of EPA Acknowledgment of Consent. (262.52(c))	GOR	<input type="checkbox"/>		NI	N/A
iv)	Compiled with manifest requirements Rule in 309(2)(a-i).	GOR	<input type="checkbox"/>		NI	N/A
v)	If required, was an exception report filled. (309(3)(a-c))	GOR	<input type="checkbox"/>		NI	N/A
b)	Importing, has the generator met manifest requirements? (Rule 310: 40 CFR 262.60)	GOR	<input type="checkbox"/>		NI	N/A

Rule 306(1)(g) and 40 CFR 262.34(a)(1) refers to 40 CFR 265.111 & 265.114.

ACCUMULATION AREA CLOSURE (265.111 & 265.114)

50. The accumulation area must be closed in a manner that: (265.111 & 265.114)						
a)	Minimizes need for further maintenance.	GMC	<input type="checkbox"/>		NI	N/A
b)	Controls/minimizes/eliminates, to protect human health & environment, the escape of haz. waste or haz. waste constituents, leachate, run-off to ground/surface waters and air.	GMC	<input type="checkbox"/>		NI	N/A
c)	All contaminated equipment, structures, and soil properly disposed of.	GMC	<input type="checkbox"/>		NI	N/A

Comments: _____

Send to.

ARGYRI
IOANNOU, ENV. MGR.

Apollo

M1 4615894

2-27-98

only 2

Zn^3

FOOG

waste

→ Dynecol.

streams

45941

M1 7136746

6/29/98

D002- nitric Acid
spent strip
soln.



830 G D002/7/8/0010/0030

UHC vd
not listed.

Char

FOOG

Cr 5.1

Zn 100

Ni 140.

DWSD 021-001

& 3/1/99.

unless add
info.
add or
drop Pb & Cu.

fayed.

nothing on stripped

pH < 2

Ar 13

CR 22

Cu 89

Ni 94,700

Zn - 442.

* Restructuring water usage. waste min.

BR. OK 1/13/98.

CP- EC out of date.
no longer employed.
ll - describe gloves etc.
actions - leave + call EC → spell
Evacuation plan. no maps.

Working on PT } none.
asha initial }

1 Rob. - unmarked.
Hopper - unmarked HW faded Sludge dryer.
open.

ROB - DOT OK.

daily cond insp.
no doc.
police / fire / former clinic sent no doc.

STATE OF MICHIGAN



JAMES J. BLANCHARD, Governor

JRAL RESOURCES COMMISSION

THOMAS J. ANDERSON
E. R. CAROLLO
MARLENE J. FLUHARTY
STEPHEN F. MONSMA
O. STEWART MYERS
RAYMOND POUPORE
HARRY H. WHITELEY

DEPARTMENT OF NATURAL RESOURCES Hazardous Waste Division

STEVENS T. MASON BUILDING
BOX 30028
LANSING, MI 48909

1120 W. State Fair Ave.
Detroit, Michigan 48203

RONALD O. SKOOG, Director

July 27, 1984

Mr. Charles Pedrotte, President
Apollo Plating, Inc.
15765 Sturgeon
Roseville, Michigan 48066

EPA ID No: MID 052035425

Dear Mr. Pedrotte:

On July 23, 1984, acting as a representative of the United States Environmental Protection Agency, I performed an inspection of your facility located at 15765 Sturgeon, Roseville, Michigan to evaluate compliance of that facility with the requirements of subtitle C of the Resource Conservation and Recovery Act (RCRA) as amended.

As a result of that inspection, I have determined that your facility has no deficiencies in the requirements under RCRA.

Thank you for your staff's cooperation during my visit.

Sincerely,
Hazardous Waste Division

Larry AuBuchon
Detroit District Office

cc: EPA
B. Okwumabua

RCRA Inspection Report

EPA Identification Number: M I D 0 5 2 0 3 5 4 2 5

Installation Name: Apollo Plating, Inc.

Location Address: 15765 Sturgeon

City: Roseville State: Michigan 48066

Date of inspection: 7/23/84 Time of inspection (from) 1300 (to) 1330

Person(s) interviewed	Title	Telephone
<u>Todd McNulty</u>	<u>General Mgr.</u>	<u>(313) 777-0070</u>
_____	_____	_____
_____	_____	_____

Inspector(s)	Agency/Title	Telephone
<u>Larry A. Burchon</u>	<u>MDNR-HWD/WQS</u>	<u>(313) 368-3335</u>
_____	_____	_____

Installation Activity (mark only one box) Inspection Form(s)

- | | |
|---|------|
| <input checked="" type="checkbox"/> Treatment/Storage/Disposal per 40 CFR 265.1 and/or Generation and/or Transportation | A |
| <input checked="" type="checkbox"/> Treatment/Storage/Disposal (no generation or Transportation) | A |
| <input type="checkbox"/> Generation and Transportation | B, C |
| <input type="checkbox"/> Generation only | B |
| <input type="checkbox"/> Transportation only | C |

Facility is exempted from regulation under exemption 261.4(c). Manifests were kept and were in order. No deficiencies under RCRA. Spent Hydrochloric acid pumped directly from process tank which is kept in continuous service.

cc: EPA
Company

STATE OF MICHIGAN



JOHN ENGLER, Governor
DEPARTMENT OF ENVIRONMENTAL QUALITY

"Better Service for a Better Environment"
HOLLISTER BUILDING, PO BOX 30473, LANSING MI 48909-7973

INTERNET: www.deq.state.mi.us
RUSSELL J. HARDING, Director

REPLY TO:

DETROIT OFFICE
SUITE 3600
300 RIVER PLACE
DETROIT MI 48207

April 1, 1999

Mr. Todd McNulty
Vice President – Engineering
Apollo Plating, Inc.
15765 Sturgeon
Roseville, MI 48066

Dear Mr. McNulty:

SUBJECT: MID 052 035 425

This correspondence is written to acknowledge receipt of your letter dated March 4, 1999, which itemizes actions taken by Apollo Plating, Inc., (hereafter Facility), located at 15765 Sturgeon, Roseville, Michigan, to correct violations in one or more of the following Part 111, Hazardous Waste Management, Michigan Compiled Laws (MCL) 324.11101 et seq and Part 121, Liquid Industrial Wastes, MCL 324.12101 et seq. of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended; Subtitle C of the federal Resource Conservation and Recovery Act of 1976, as amended, and any administrative rules or regulations promulgated pursuant to these Acts. These violations were observed by staff of the Department of Environmental Quality (DEQ) during an inspection conducted on August 5, 1998, and the Facility was notified of these violations in letters dated August 25, 1998, October 20, 1998, December 16, 1998 and February 10, 1999.

This is to notify the Facility that based on the information in your March 4, 1999, letter, staff of the DEQ have determined that the Facility has corrected the violations identified with regard to the regulations cited.

However, this determination does not preclude nor limit the DEQ's ability to initiate other enforcement action, under state or federal law, as deemed appropriate.

If you have any questions, please feel free to contact me.

Sincerely,

A handwritten signature in cursive script that reads "Jeanette M. Noechel".

Jeanette M. Noechel
Environmental Quality Analyst
Waste Management Division
313-392-6524

cc: Dr. Benedict N. Okwumabua, WMD, DEQ



QS 9000 / ISO 9002
ISO 14001
REGISTERED

APOLLO PLATING, INC.

Meeting Expectations

Todd McNulty

V.P. of Engineering

Phone: 586.777.0070 • Fax: 586.777.7430
15765 Sturgeon • Roseville, Michigan 48066
e-mail: trmcnulty@tir.com

Quality and Service Out of this World
APOLLO PLATING, INC.

15765 Sturgeon
Roseville, MI 48066

(810) 777-0070
Fax (810) 777-7430

March 4, 1999

Ms. Jeanette M. Noechel
Environmental Quality Analyst
Waste Management Division
Department of Environmental Quality
300 River Place, Ste. 3600
Detroit MI 48207

Re: MID 052 035 425

Dear Ms. Noechel:

In response to your letter dated February 10, 1999, please be advised of the following:

Item 14 – The Contingency Plan, Spill Prevention and Site Map for Apollo Plating, Inc. was mailed by certified mail, return receipt requested, to each of the emergency response agencies listed in the Contingency Plan, together with a letter inviting those agencies to tour our facility. Copies of those letters and the certified mailing receipts are enclosed as proof of such mailing.

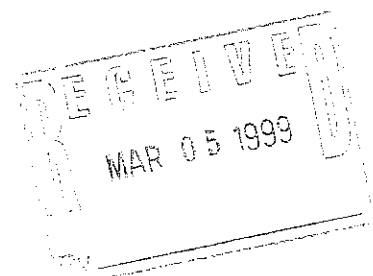
Please contact the undersigned if you have any questions.

Very truly yours,



Todd McNulty
Vice President - Engineering

TM:sd
Enclosures



Z 048 077 063

US Postal Service

Receipt for Certified Mail

No Insurance Coverage Provided.

Do not use for International Mail (See reverse)

Sent to Chief Lucas / Police Chief	
Street & Number 29753 Gratiot	
Post Office, State, & ZIP Code Roseville MI 48066	
Postage	\$ 99
Certified Fee	1.40
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	1.25
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$ 3.64
Postmark or Date USPS	

PS Form 3800, April 1995

P 507 615 825

US Postal Service

Receipt for Certified Mail

No Insurance Coverage Provided.

Do not use for International Mail (See reverse)

Sent to Gary Popiel / Administrator	
Street & Number 13355 E. Ten Mile Rd	
Post Office, State, & ZIP Code Warren MI 48089	
Postage	\$ 99
Certified Fee	1.40
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	1.25
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$ 3.64
Postmark or Date	

PS Form 3800, April 1995

Z 048 077 066

US Postal Service

Receipt for Certified Mail

No Insurance Coverage Provided.

Do not use for International Mail (See reverse)

Sent to Robert MacKurler	
Street & Number 665 Harrison Street	
Post Office, State, & ZIP Code Trenton MI 48183	
Postage	\$ 99
Certified Fee	1.40
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	1.25
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$ 3.64
Postmark or Date	

PS Form 3800, April 1995

Z 048 077 064

US Postal Service

Receipt for Certified Mail

No Insurance Coverage Provided.

Do not use for International Mail (See reverse)

Sent to George Hickman / Fire Chief	
Street & Number 18750 Common Rd.	
Post Office, State, & ZIP Code Roseville MI 48066	
Postage	\$ 99
Certified Fee	1.40
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	1.25
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$ 3.64
Postmark or Date	

PS Form 3800, April 1995

Quality and Service Out of this World

APOLLO PLATING, INC.

15765 Sturgeon
Roseville, MI 48066

(810) 777-0070
Fax (810) 777-7430

March 4, 1999

Mr. Robert MacKinder
Michigan Pumping Service
605 Harrison St.
Trenton, MI 48183

**Certified Mail - Return
Receipt Requested**

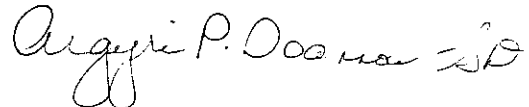
Re: Apollo Plating, Inc.
Contingency Plan

Dear Mr. MacKinder:

Enclosed for your information is a copy of our company's Contingency Plan and Spill Prevention Plan, together with an updated layout map of our facility.

We invite you to tour our facility, and you may call the undersigned to schedule an appointment for the tour.

Very truly yours,



Argyri P. Ioannou
Environmental Manager

AI:sd

Enclosures

cc: Ms. Jeanette M. Noechel - Dept. of
Environmental Quality

Quality and Service Out of this World

APOLLO PLATING, INC.

15765 Sturgeon
Roseville, MI 48066

(810) 777-0070
Fax (810) 777-7430

March 4, 1999

William Lucas
City of Roseville
Police Department
18750 Common Rd.
Roseville MI-48066

**Certified Mail - Return
Receipt Requested**

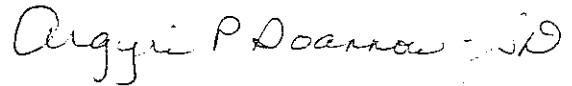
Re: Apollo Plating, Inc.
Contingency Plan

Dear Chief Lucas:

Enclosed for your information is a copy of our company's Contingency Plan and Spill Prevention Plan, together with an updated layout map of our facility.

We invite you to tour our facility, and you may call the undersigned to schedule an appointment for the tour.

Very truly yours,



Argyri P. Ioannou
Environmental Manager

AI:sd

Enclosures

cc: Ms. Jeanette M. Noechel - Dept. of
Environmental Quality

Quality and Service Out of this World

APOLLO PLATING, INC.

15765 Sturgeon
Roseville, MI 48066

(810) 777-0070
Fax (810) 777-7430

March 4, 1999

Mr. Gary Popiel
Administrator
Bi-County Hospital
13355 E. Ten Mile Rd.
Warren MI 48089

**Certified Mail - Return
Receipt Requested**

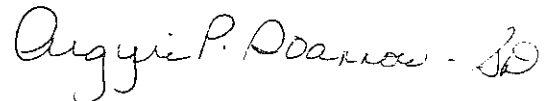
Re: Apollo Plating, Inc.
Contingency Plan

Dear Mr. Popiel:

Enclosed for your information is a copy of our company's Contingency Plan and Spill Prevention Plan, together with an updated layout map of our facility.

We invite you to tour our facility, and you may call the undersigned to schedule an appointment for the tour.

Very truly yours,



Argyri P. Ioannou
Environmental Manager

AI:sd

Enclosures

cc: Ms. Jeanette M. Noechel - Dept. of
Environmental Quality

Quality and Service Out of this World

APOLLO PLATING, INC.

15765 Sturgeon
Roseville, MI 48066

(810) 777-0070
Fax (810) 777-7430

March 4, 1999

George Hickman
City of Roseville
Fire Department
18750 Common Rd.
Roseville MI-48066

**Certified Mail - Return
Receipt Requested**

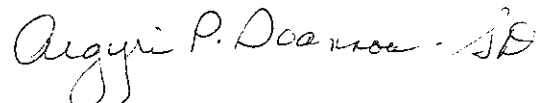
Re: Apollo Plating, Inc.
Contingency Plan

Dear Chief Hickman:

Enclosed for your information is a copy of our company's Contingency Plan and Spill Prevention Plan, together with an updated layout map of our facility.

We invite you to tour our facility, and you may call the undersigned to schedule an appointment for the tour.

Very truly yours,



Argyri P. Ioannou
Environmental Manager

AI:sd

Enclosures

cc: Ms. Jeanette M. Noechel - Dept. of
Environmental Quality

STATE OF MICHIGAN



JOHN ENGLER, Governor

DEPARTMENT OF ENVIRONMENTAL QUALITY

"Better Service for a Better Environment"

HOLLISTER BUILDING, PO BOX 30473, LANSING MI 48909-7973

INTERNET: www.deq.state.mi.us

RUSSELL J. HARDING, Director

REPLY TO:

DETROIT OFFICE
SUITE 3600
300 RIVER PLACE
DETROIT MI 48207

February 10, 1999

Mr. Todd McNulty
Vice President – Engineering
Apollo Plating, Inc.
15765 Sturgeon
Roseville, MI 48066

Dear Mr. McNulty:

SUBJECT: MID 052 035 425

This correspondence is written to acknowledge receipt of your letter dated January 15, 1999, which itemizes actions taken by Apollo Plating, Inc., (hereafter Facility), located at 15765 Sturgeon, Roseville, Michigan, to correct the violations in one or more of the following: Part 111, Hazardous Waste Management, Michigan Compiled Laws (MCL) 324.11101 et seq. and Part 121, Liquid Industrial Wastes, MCL 324.12101 et seq. of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended; Subtitle C of the federal Resource Conservation and Recovery Act of 1976, as amended, and any administrative rules or regulations promulgated pursuant to these Acts. These violations were observed by staff of the Department of Environmental Quality (DEQ) during an inspection conducted on August 5, 1998, and the Facility was notified of these violations in letter dated August 25, 1998, October 20, 1998 and December 16, 1998.

Staff of the DEQ have reviewed the Facility's submittal for compliance with the regulations. As a result of the review, staff of the DEQ have determined that the Facility is still in violation of the following:

Item 14

The Facility contingency plan is approved. Please document that a copy of the contingency plan has been provided to local authorities (at a minimum, the local police and fire departments and a local hospital or clinic). Certified mail receipts or other signed receipts would be acceptable documentation.

The Facility must respond to the violations noted in this letter. Please submit documentation to this office regarding those actions taken to address the violations by

Mr. Todd McNulty

2

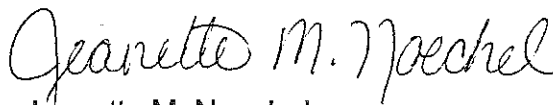
February 10, 1999

March 8, 1999. The DEQ will evaluate the response and determine the Facility's compliance status and notify you of this determination.

This letter of warning does not preclude nor limit the DEQ's ability to initiate any other enforcement action, under state or federal law, as deemed appropriate.

If you have any questions, feel free to contact me.

Sincerely,

A handwritten signature in cursive script that reads "Jeanette M. Noechel".

Jeanette M. Noechel
Environmental Quality Analyst
Waste Management Division
313-392-6524

cc: Dr. Benedict N. Okwumabua, WMD, DEQ

Quality and Service Out of this World

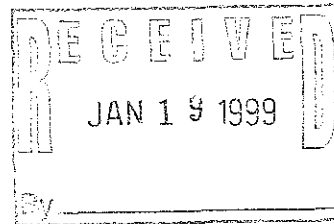
APOLLO PLATING, INC.

15765 Sturgeon
Roseville, MI 48066

(810) 777-0070
Fax (810) 777-7430

January 15, 1999

Ms. Jeanette M. Noechel
Environmental Quality Analyst
Waste Management Division
Department of Environmental Quality
300 River Place, Ste. 3600
Detroit MI 48207



Re: MID 052 035 425

Dear Ms. Noechel:

In response to your letter dated December 16, 1998, please be advised of the following:

Item 8

You state that Ms. Ioannou's training was conducted "more than one year ago." Granted, as of the date of your letter, December 16, you might assume that Ms. Ioannou's refresher training may be delinquent, but as of the date of our response November 18, 1998, Ms. Ioannou's training was current. Nevertheless, Ms. Ioannou has subsequently received refresher training on December 4, 1998; a copy of her personal training record is enclosed.

Further, you state that "...the training records for yourself, Todd McNulty, indicate that the last refresher training was received January 5, 1998 – a date still in the future." Ms. Noechel, January 5, 1998, is not a date in "still in the future," but is a date in the past. My refresher training must be completed within 365 days, which is on or before January 5, 1999. For your information, my refresher training is scheduled to be conducted on January 4, 1999, which is within 365 days of my last training.

Items 9 and 10

Presumably referring a lack of definition of the word emergency, your first paragraph indicates that "It should be made clear what those emergencies are,..."

Ms. Jeanette M. Noechel
December 22, 1998

2

Accordingly, paragraph 1 of the Contingency Plan has been revised to include a definition of the word "Emergency," which includes fire and explosion, in addition to spills.

Your second paragraph indicates that "The contingency plan now does not contain a list of emergency equipment." See page 4 of the Contingency Plan, Paragraph 4.D., which does in fact list emergency equipment and states that the location of such emergency equipment is noted on the Site Map.

In your third paragraph, referring to evacuation routes marked on the Site Map, you state that "... the purpose of the arrows is not described" and "The legend for the map should clearly specify the evacuation routes." The legend on our Site Map, located in the lower right corner of the map, clearly indicates that the lines and arrows indicate "Evacuation Routes."

Item 14

The Contingency Plan has been revised as indicated above, and a copy of the revised Plan is enclosed.

Very truly yours,

A handwritten signature in black ink, appearing to read "Todd McNulty", with a stylized flourish at the end.

Todd McNulty
Vice President - Engineering

EMPLOYEE HAZARDOUS WASTE TRAINING

RECORDS

PERSONNEL MUST RECEIVE INITIAL TRAINING WITHIN SIX MONTHS AFTER THE DATE OF THEIR EMPLOYMENT OR ASSIGNMENT TO A JOB THAT IS RELATED TO THE MANAGEMENT OF HAZARDOUS WASTE. AFTER THE INITIAL TRAINING FACILITY PERSONNEL MUST BE TRAINED ANNUALLY.

EMPLOYEE NAME: ARGYRI P IOANNOU

JOB TITLE: ENVIRONMENTAL MANAGER

JOB DESCRIPTION: MONITORING THE PRETREATMENT SYSTEM FOR COMPLIANCE
IN CHARGE OF HAZARDOUS WASTE FOR THE FACILITY
EMERGENCY COORDINATOR
STORM WATER CERTIFY OFFICER

INITIAL TRAINING: DEC 08, 1995

ANNUAL TRAINING: NOV 23, 1998

TYPES AND AMOUNT OT TRAINING:

ARGYRI P IOANNOU HAD ON THE JOB TRAINING FOR

COMMUNICATIONS SYSTEMS
EMERGENCY PROCEDURES
RESPONSE TO FIRES OR EXPLOSIONS
SHUTDOWN OF OPERATIONS,
RESPONSE TO UNPLANNED SUDDEN OR NON-SUDDEN RELEASES OF HAZARDOUS WASTE
CONSTITUENTS OT AIR, SOIL OR SURFACE WATER
CONTINGENCY PLAN IMPLEMENTATION
SLUG/SPILL PREVENTION PLAN

ONE DAY CLASSROOM TRAINING ON

MATERIAL SAFETY DATA SHEETS
RIGHT -TO- KNOW
HAZARDOUS MATERIALS
CONFINED SPACES ENTRY
STORM WATER OPERATOR AND CERTIFY OFFICER
RCRA/PART III COMPLIANCE

NOTE: ANY PERSONNEL TRAINING PROVIDED WILL INCLUDE ANY UPDATES/REVISIONS TO THE CONTINGENCY PLAN.

SIGN: Argyri P Ioannou
04-09-168-AP
REV 8/98

EMPLOYEE HAZARDOUS WASTE TRAINING

RECORDS

PERSONNEL MUST RECEIVE INITIAL TRAINING WITHIN SIX MONTHS AFTER THE DATE OF THEIR EMPLOYMENT OR ASSIGNMENT TO A JOB THAT IS RELATED TO THE MANAGEMENT OF HAZARDOUS WASTE. AFTER THE INITIAL TRAINING FACILITY PERSONNEL MUST BE TRAINED ANNUALLY.

EMPLOYEE NAME TODD MCNULTY

JOB TITLE: VICE PRESIDENT OF ENGINEERING

JOB DESCRIPTION:

MACHINE REPAIR
ELECTRICIAN
EQUIPMENT ENHANCEMENTS
GENERAL MAINTENANCE
TOOL DESIGN

INITIAL TRAINING: JAN 05, 1995

ANNUAL TRAINING: JAN 04, 1999

TYPES AND AMOUNT OT TRAINING:

ON THE JOB TRAINING FOR SIX MONTHS

EMERGENCY SYSTEMS (COMMUNICATION & ALARMS)
EMERGENCY EQUIPMENT (WATER MAINS, GLOVES, BREATHING APPARATUS, FIRE EXTINGUISHERS).
RESPONSE TO FIRES OR EXPLOSIONS
SHUT DOWN OPERATIONS
CONTINGENCY PLAN IMPLEMENTATION

ONE DAY CLASSROOM TRAINING ON

HAZARDOUS MATERIALS
RIGHT TO KNOW
CONFINED SPACES ENTRY

NOTE: ANY PERSONNEL TRAINING PROVIDED WILL INCLUDE ANY UPDATES/REVISIONS TO THE CONTINGENCY PLAN.

SIGN: 

F-0400-09-68

REV 8/98

STATE OF MICHIGAN



JOHN ENGLER, Governor
DEPARTMENT OF ENVIRONMENTAL QUALITY

"Better Service for a Better Environment"
HOLLISTER BUILDING, PO BOX 30473, LANSING MI 48909-7973

INTERNET: www.deq.state.mi.us

RUSSELL J. HARDING, Director

REPLY TO:

DETROIT OFFICE
SUITE 3600
300 RIVER PLACE
DETROIT MI 48207

December 16, 1998

Mr. Todd McNulty
Vice President – Engineering
Apollo Plating, Inc.
15765 Sturgeon
Roseville, MI 48066

Dear Mr. McNulty:

SUBJECT: MID 052 035 425

This correspondence is written to acknowledge receipt of your letter dated November 18, 1998, which itemizes actions taken by Apollo Plating, Inc., (hereafter Facility), located at 15765 Sturgeon, Roseville, Michigan, to correct the violations in one or more of the following Part 111, Hazardous Waste Management, Michigan Compiled Laws (MCL) 324.11101 et seq and Part 121, Liquid Industrial Wastes, MCL 324.12101 et seq. of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended; Subtitle C of the federal Resource Conservation and Recovery Act of 1976, as amended, and any administrative rules or regulations promulgated pursuant to these Acts. These violations were observed by staff of the Department of Environmental Quality (DEQ) during an inspection conducted on August 5, 1998, and the Facility was notified of these violations in letters dated August 25, 1998 and October 20, 1998.

Staff of the DEQ have reviewed the Facility's submittal for compliance with the regulations. As a result of the review, staff of the DEQ have determined that the Facility is still in violation of the following:

Item 8

Most of the personnel training records provided have varying dates. This is not a violation in itself, however, please note that this makes it more difficult to ensure that annual training is conducted on time.

In the case of Ms. Ioannou, the corrected copy of her training form indicates that her last training was received on December 5, 1997 – more than one year ago. Annual means 'within 365 days', not once per year, which could make training dates as much as 23-24 months apart (such as a training in January 1997 and a training in December 1998 – this is not considered annual and is not acceptable). Please document that Ms. Ioannou has received her annual refresher training, and ensure that all employees receive their refresher training on an annual basis.

In this same vein, the training records for yourself, Todd McNulty, indicate that the last refresher training was received January 5, 1998 – a date still in the future. If this is a planned refresher

training, please document that it was actually conducted. If this is a misprint – it should read January 5, 1997 – then the refresher training for yourself was also not conducted on the required annual basis. Please clarify this record.

Items 9 & 10

- The actions facility personnel are to take are described for 'emergencies'. It should be made clear what those emergencies are, and they should include the required emergencies fires, explosions and spills.
- The contingency plan now does not contain a list of emergency equipment. Both a list and a location for the equipment must be provided, either a list of equipment plus a map showing where the equipment is located, or a list which also describes the location, or a map showing locations which also contains a list.
- Exits are noted on the site plan, and arrows are shown, but the purpose of the arrows is not described (a flow chart of material through the plant? Pointing out specific features? Evacuation routes? What are they?). The legend for the map should clearly specify the evacuation routes.

Item 14

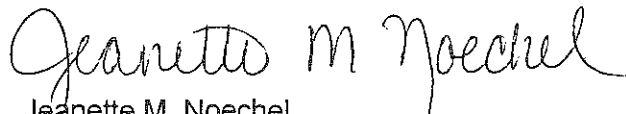
Please update the contingency plan as noted in items 9 & 10, above. It is recommended that the Facility submit the revised contingency plan to this office for review and approval prior to submitting the contingency plan to local authorities. Once the plan has been approved and has been submitted to local authorities, documentation (such as certified mail receipts or signed receipt letters) must be maintained and copies of this documentation must be provided to this office.

The Facility must respond to the violations noted in this letter. Please submit documentation to this office regarding those actions taken to address the violations by January 18, 1998. The DEQ will evaluate the response and determine the Facility's compliance status and notify you of this determination.

This letter of warning does not preclude nor limit the DEQ's ability to initiate any other enforcement action, under state or federal law, as deemed appropriate.

If you have any questions, feel free to contact me.

Sincerely,



Jeanette M. Noechel
Environmental Quality Analyst
Waste Management Division
313-392-6524

cc: Dr. Benedict N. Okwumabua, WMD, DEQ

Quality and Service Out of this World
APOLLO PLATING, INC.

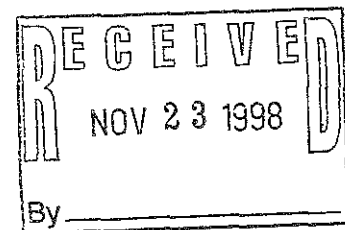
15765 Sturgeon
Roseville, MI 48066

(810) 777-0070
Fax (810) 777-7430

November 18, 1998

Ms. Jeanette M. Noechel
Environmental Quality Analyst
Waste Management Division
Department of Environmental Quality
300 River Place, Ste. 3600
Detroit MI 48207

Re: MID 052 035 425



Dear Ms. Noechel:

In response to your letter dated October 20, 1998, please be advised of the following (paragraph numbers coincide with those in your letter):

3 - Both the roll-off box and hopper have been placarded with signage which contains all applicable information. The information contained on the individual placards will be updated on an as needed basis.

5 and 6 - If in the future any additional hazard collection containers are added, these will be properly identified and labeled. Additionally, any inspections which are to be conducted pursuant to these additions will be cause for the creation of container specific inspection forms.

8 - The personal training record for Ms. Ioannou was a misprint, as in fact the date should read December 1997. In addition, training dates for all other previously listed employees have been updated to contain month/date/year information (copies are provided).

The Employee Hazardous Waste Training forms (see attached) indicate that, if there are any updates/revisions to the Contingency Plan, updated training will be conducted as required for all individuals in this classification.

9 - Arrangements with local authorities are described in the Contingency Plan. See Contingency Plan, page 4, Section 5 - Coordination Agreements.

10 -

- A. The Contingency Plan lists the actions facility personnel are to take in the event of an emergency. See highlighted portions of Contingency Plan, page 2, Section 3, Emergency Response Procedures, and page 3, Section 3 D - Control Procedures.
- B. Arrangements with local authorities are described in the Contingency Plan. See Contingency Plan, page 4, Section 5 - Coordination Agreements.
- D. The locations of emergency equipment are on the Site Safety Map Map. See copy attached.
- E. An evacuation plan/route for personnel is shown on the Site Safety Map. See copy attached. In addition, see Contingency Plan, page 5, Section 6 - Evacuation Plan.

12 - The Emergency Coordinator and his/her alternates have the authority to carry out the Contingency Plan. See Contingency Plan, page 1, Section 2 - Emergency Coordinators.

14 - The Contingency Plan has been updated as requested (copy enclosed). Upon acceptance of the Plan by the DEQ, a copy of the Plan will be submitted to local authorities and documentation of such submission will be provided to the DEQ.

Please advise if you require any additional information.

Very truly yours,



Todd McNulty
Vice President - Engineering

TM:sd
Enclosures

EMPLOYEE HAZARDOUS WASTE TRAINING

RECORDS

PERSONNEL MUST RECEIVE INITIAL TRAINING WITHIN SIX MONTHS AFTER THE DATE OF THEIR EMPLOYMENT OR ASSIGNMENT TO A JOB THAT IS RELATED TO THE MANAGEMENT OF HAZARDOUS WASTE. AFTER THE INITIAL TRAINING FACILITY PERSONNEL MUST BE TRAINED ANNUALLY.

EMPLOYEE NAME: ARGYRI P IOANNOU

JOB TITLE: ENVIRONMENTAL MANAGER

JOB DESCRIPTION: MONITORING THE PRETREATMENT SYSTEM FOR COMPLIANCE
IN CHARGE OF HAZARDOUS WASTE FOR THE FACILITY
EMERGENCY CORDINATOR
STORM WATER CERTIFY OFFICER

INITIAL TRAINING: DEC 08, 1995

ANNUAL TRAINING: DEC 05, 1997

TYPES AND AMOUNT OT TRAINING:

ARGYRI P IOANNOU HAD ON THE JOB TRAINING FOR

COMMUNICATIONS SYSTEMS
EMERGENCY PROCEDURES
RESPONSE TO FIRES OR EXPLOSIONS
SHUTDOWN OF OPERATIONS,
RESPONSE TO UNPLANNED SUDDEN OR NON-SUDDEN RELEASES OF HAZARDOUS WASTE
CONSTITUENTS OT AIR, SOIL OR SURFACE WATER
CONTINGENCY PLAN IMPLEMENTATION
SLUG/SPILL PREVENTION PLAN

ONE DAY CLASSROOM TRAINING ON

MATERIAL SAFETY DATA SHEETS
RIGHT -TO- KNOW
HAZARDOUS MATERIALS
CONFINED SPACES ENTRY
STORM WATER OPERATOR AND CERTIFY OFFICER
RCRA/PART III COMPLIANCE

NOTE: ANY PERSONNEL TRAINING PROVIDED WILL INCLUDE ANY UPDATES/REVISIONS TO THE CONTINGENCY PLAN.

SIGN: Argyri P Ioannou
04-09-168-AP
REV 8/98

EMPLOYEE HAZARDOUS WASTE TRAINING

RECORDS

PERSONNEL MUST RECEIVE INITIAL TRAINING WITHIN SIX MONTHS AFTER THE DATE OF THEIR EMPLOYMENT OR ASSIGNMENT TO A JOB THAT IS RELATED TO THE MANAGEMENT OF HAZARDOUS WASTE. AFTER THE INITIAL TRAINING FACILITY PERSONNEL MUST BE TRAINED ANNUALLY.

EMPLOYEE NAME: _ DAVE SHOVE

JOB TITLE: MAINTENANCE DEP. SUPERVISOR

JOB DESCRIPTION:

MACHINE REPAIR
ELECTRICIAN
EQUIPMENT UPDATE
GENERAL MAINTENANCE

INITIAL TRAINING: MAY 06, 1996

ANNUAL TRAINING: MAY 04, 1998

TYPES AND AMOUNT OT TRAINING:


ON THE JOB TRAINING ON

EMERGENCY SYSTEMS (COMMUNICATIONS & ALARMS)
EMERGENCY EQUIPMENT (WATER MAINS , GLOVES , BREATHING
APPARATUS, FIRE EXTINGUISHERS)
RESPONSE TO FIRES OR EXPLOSIONS
SHUT DOWN OPERATIONS
CONTINGENCY PLAN IMPLEMENTATION

ONE DAY CLASSROOM TRAINING ON

HAZARDOUS MATERIALS
RIGHT TO KNOW
CONFINED SPACES ENTRY

NOTE: ANY PERSONNEL TRAINING PROVIDED WILL INCLUDE ANY UPDATES/REVISIONS TO THE CONTINGENCY PLAN.

SIGN: 

EMPLOYEE HAZARDOUS WASTE TRAINING

RECORDS

PERSONNEL MUST RECEIVE INITIAL TRAINING WITHIN SIX MONTHS AFTER THE DATE OF THEIR EMPLOYMENT OR ASSIGNMENT TO A JOB THAT IS RELATED TO THE MANAGEMENT OF HAZARDOUS WASTE. AFTER THE INITIAL TRAINING FACILITY PERSONNEL MUST BE TRAINED ANNUALLY.

EMPLOYEE NAME TODD MCNULTY

JOB TITLE: VICE PRESIDENT OF ENGINEERING

JOB DESCRIPTION:

MACHINE REPAIR
ELECTRICIAN
EQUIPMENT ENHANCEMENTS
GENERAL MAINTENANCE
TOOL DESIGN

INITIAL TRAINING: JAN 05, 1995

ANNUAL TRAINING: JAN 05, 1998

TYPES AND AMOUNT OF TRAINING:

ON THE JOB TRAINING FOR SIX MONTHS

EMERGENCY SYSTEMS (COMMUNICATION & ALARMS)
EMERGENCY EQUIPMENT (WATER MAINS, GLOVES, BREATHING APPARATUS, FIRE EXTINGUISHERS).
RESPONSE TO FIRES OR EXPLOSIONS
SHUT DOWN OPERATIONS
CONTINGENCY PLAN IMPLEMENTATION

ONE DAY CLASSROOM TRAINING ON

HAZARDOUS MATERIALS
RIGHT TO KNOW
CONFINED SPACES ENTRY

NOTE: ANY PERSONNEL TRAINING PROVIDED WILL INCLUDE ANY UPDATES/REVISIONS TO THE CONTINGENCY PLAN.

SIGN: 

F-0400-09-68

REV 8/98

EMPLOYEE HAZARDOUS WASTE TRAINING

RECORDS

PERSONNEL MUST RECEIVE INITIAL TRAINING WITHIN SIX MONTHS AFTER THE DATE OF THEIR EMPLOYMENT OR ASSIGNMENT TO A JOB THAT IS RELATED TO THE MANAGEMENT OF HAZARDOUS WASTE. AFTER THE INITIAL TRAINING FACILITY PERSONNEL MUST BE TRAINED ANNUALLY.

EMPLOYEE NAME: DESHONE L LAWRENCE

JOB TITLE: WASTE TREATMENT TECHNICIAN

JOB DESCRIPTION:

DUMP FILTER CAKE FROM FILTER PRESS
DRY FILTER CAKE
SWEEP AROUND WASTE TREATMENT
TRANSFERRED FILTER CAKE TO ROLL-OFF BOX
INSPECT MIXERS ON THE WASTE TREATMENT
GENERAL HOUSEKEEPING

INITIAL TRAINING: JULY 07, 1998

ANNUAL TRAINING: TYPES AND AMOUNT OT TRAINING:

DESHONE LAWRENCE HAD 2 MONTHS ON THE JOB TRAINING ON THE

EMERGENCY PROCEDURES

COMMUNICATIONS

CONTINGENCY PLAN

SLUG/SPILL PREVENTION PLAN

ONE DAY CLASSROOM INSTRUCTIONS VIDEOS ON

HOW TO HANDLE HAZARDOUS MATERIALS

CONFINED SPACES.

MATERIAL SAFETY DATA SHEETS

NOTE: ANY PERSONNEL TRAINING PROVIDED WILL INCLUDE ANY UPDATES/REVISIONS TO THE CONTINGENCY PLAN.

SIGN:

Deshone Lawrence

04-09-168-AP

REV 8/98

EMPLOYEE HAZARDOUS WASTE TRAINING RECORDS

PERSONNEL MUST RECEIVE INITIAL TRAINING WITHIN SIX MONTHS AFTER THE DATE OF THEIR EMPLOYMENT OR ASSIGNMENT TO A JOB THAT IS RELATED TO THE MANAGEMENT OF HAZARDOUS WASTE. AFTER THE INITIAL TRAINING FACILITY PERSONNEL MUST BE TRAINED ANNUALLY.

EMPLOYEE NAME: JOHN DEAN

JOB TITLE: WASTE TREATMENT TECHNICIAN

JOB DESCRIPTION:

DAILY EFFLUENT ANALYSIS
DAILY FILTER CAKE DUMPING
FILTER CAKE DRYING
INSPECTION OF ROLL OFF WEEKLY
WASTE TREATMENT CHEMICAL MAKE UP
TRANSFERRING HAZARDOUS WASTE TO THE ROLL OFF BOX
RIGHT- TO - KNOW LAW
HANDLING OF HAZARDOUS MATERIALS

INITIAL TRAINING: MARCH 10, 1995

ANNUAL TRAINING: MARCH 09, 1998

TRAINED BY: ENVIRONMENTAL MANAGER

TYPES AND AMOUNT OT TRAINING: THE ABOVE EMPLOYEE HAS BEEN TRAINED FOR THREE (3) MONTHS ON THE FOLLOWING TOPICS.

EMERGENCY PROCEDURES
EMERGENCY SYSTEMS (SUCH AS COMMUNICATION SYSTEMS)
RESPONSE TO FIRES OR EXPLOSIONS
CONTINGENCY PLAN
SLUG/SPILL PREVENTION PLAN
MATERIAL SAFETY DATA SHEETS

NOTE: ANY PERSONNEL TRAINING PROVIDED WILL INCLUDE ANY UPDATES/REVISIONS TO THE CONTINGENCY PLAN.

SIGN: 

04-09-168-AP
REV 8/1998

STATE OF MICHIGAN



JOHN ENGLER, Governor
DEPARTMENT OF ENVIRONMENTAL QUALITY

"Better Service for a Better Environment"
HOLLISTER BUILDING, PO BOX 30473, LANSING MI 48909-7973

INTERNET: www.deq.state.mi.us
RUSSELL J. HARDING, Director

REPLY TO:

DETROIT OFFICE
SUITE 3600
300 RIVER PLACE
DETROIT MI 48207

October 20, 1998

Mr. Todd McNulty
Vice President – Engineering
Apollo Plating, Inc.
15765 Sturgeon
Roseville, MI 48066

Dear Mr. McNulty:

SUBJECT: MID 052 035 425

This correspondence is written to acknowledge receipt of your letter dated September 24, 1998, which itemizes actions taken by Apollo Plating, Inc., (hereafter Facility), located at 15765 Sturgeon, Roseville, Michigan, to correct the violations in one or more of the following Part 111, Hazardous Waste Management, Michigan Compiled Laws (MCL) 324.11101 et seq and Part 121, Liquid Industrial Wastes, MCL 324.12101 et seq. of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended; Subtitle C of the federal Resource Conservation and Recovery Act of 1976, as amended, and any administrative rules or regulations promulgated pursuant to these Acts. These violations were observed by staff of the Department of Environmental Quality (DEQ) during an inspection conducted on August 5, 1998, and the Facility was notified of these violations in a letter dated August 25, 1998.

Staff of the DEQ have reviewed the Facility's submittal for compliance with the regulations. As a result of the review, staff of the DEQ have determined that the Facility is still in violation of the following:

Item 3

The Facility response to this item mentioned only the hopper used to collect filter press cake. Please note that the roll off box must also be properly marked as a hazardous waste container. Please document that the roll off box has been marked as a hazardous waste container.

Items 5 & 6

The response to this item appears acceptable, however, please note that it is specific to the roll off box. Please ensure that, if any other containers of hazardous waste are present on site and must be inspected, either this form will be modified to accommodate other types of containers or a new form will be created for multiple types of containers.

Item 8

The personnel training record for Argyri P. Ioannou states that refresher training was provided in December 1998. If this date is correct, it means training has not yet been provided, so the Facility must document that this training has occurred – when December 1998 comes around. If this is meant to read December 1997 – this form must be corrected.

In addition, refresher training is supposed to be provided on an annual basis – in order to show compliance with this requirement, the actual dates of training must be provided, not just the month and year. Please correct these forms to show the day, month and year of annual refresher and, for newly trained employee, the initial training and all training thereafter.

Please see items 9 & 10, below, regarding contingency plan issues. Please document that any personnel training provided includes any updates/revisions to the contingency plan. The Facility may choose to wait to provide additional training until the contingency plan has been reviewed and approved by the DEQ.

Items 9 & 10

Please review the following issues:

- The Facility contingency plan must include the actions facility personnel are to take in the event of an emergency. Only the actions that the Facility emergency coordinator are to take are listed in the Facility contingency plan.
- Arrangements with local authorities must be described in the plan (Meetings? Contacts? Tours? Obligations during an emergency event?)
- The locations of emergency equipment are stated to be on a Site Plan (page 4 of the contingency plan). No such Site Plan was included with the response. Please provide a copy of this Site Plan
- The Facility evacuation plan states that there are various evacuation routes through the Facility but does not describe them further (exits 1, 2 or 3, page 5 of the contingency plan). The primary and alternate evacuation routes must be clearly described (such as on a map or plan of the site). Also the signals used to begin evacuation must be clearly described. The contingency plan simply states that the signals will be given by the emergency coordinator or his alternate. Is this signal an announcement over the PA system? A siren? Please clarify.

Please provide a copy of the corrected Facility contingency plan to this office. See item 14, below.

Item 12

Please verify that the current emergency coordinators at the Facility have the authority to carry out the contingency plan, as required in 40 CFR 265.55 (Rule 306(1)(d): 40 CFR 265.55).

Item 14

Please update the contingency plan as noted in items 9 & 10, above. It is recommended that the Facility submit this contingency plan to this office for review and approval prior to submitting the contingency plan to local authorities. When the plan is submitted to local authorities, documentation (such as certified mail receipts, etc.) must be maintained and copies of this

documentation must be provided to this office. Please correct the contingency plan as noted above (items 9 & 10) and provide information as to when the Facility expects to provide a copy of the contingency plan to local authorities, and provide documentation of same to this office.

The Facility must respond to the violations noted in this letter. Please submit documentation to this office regarding those actions taken to address the violations by November 23, 1998. The DEQ will evaluate the response and determine the Facility's compliance status and notify you of this determination.

This letter of warning does not preclude nor limit the DEQ's ability to initiate any other enforcement action, under state or federal law, as deemed appropriate.

If you have any questions, feel free to contact me.

Sincerely,

A handwritten signature in cursive script that reads "Jeanette M Noechel".

Jeanette M. Noechel
Environmental Quality Analyst
Waste Management Division
313-392-6524

cc: Dr. Benedict N. Okwumabua, WMD, DEQ

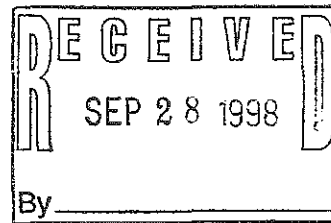
Quality and Service Out of this World
APOLLO PLATING, INC.

15765 Sturgeon
Roseville, MI 48066

(810) 777-0070
Fax (810) 777-7430

September 24, 1998

Ms. Jeanette M. Noechel
Environmental Quality Analyst
Waste Management Division
Department of Environmental Quality
300 River Place, Ste. 3600
Detroit MI 48207



Re: MID 052 035 425

Dear Ms. Noechel:

In response to your letter dated August 25, 1998, regarding the August 5 inspection of our facility, please be advised of the following (paragraph numbers coincide with those in your letter):

1. As decided at the time of your visit, no further response is required.
2.
 - a) As decided at the time of your visit, no further response is required.
 - b) Please find enclosed LDR form as requested.
3. The waste hopper has, since August 6, has been identified as a hazardous waste container using the following: A placard was developed containing the waste codes and the date at which time accumulation began. A copy of this sign is included.
4. The waste accumulation hopper now has in place a cover to prevent filter cake dust from becoming airborne, during times dryer is inoperative.
5. A copy of the weekly checklist is enclosed.
6. Copies of the weekly checklist will be maintained on site for a period not less than three years from dates of inspection.

7. Please see enclosed documentation covering training procedures which have been conducted. In addition, as new members have been assigned to the Contingency Plan Committee, they have also been trained to carry out the Contingency Plan objectives.

8. The documentation requested is enclosed to show that the training has been completed.

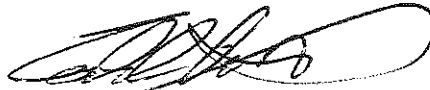
9. Information to be provided to the listed local authorities is complete and will be provided upon your Department's acceptance of our Contingency Plan.

10, 11, 12, and 13. A copy of our updated Contingency Plan is enclosed.

14. See updated Contingency Plan. In addition, information to be provided to the listed local authorities is complete and will be provided upon your Department's acceptance of our Contingency Plan

Comment A: The decision was made by our contracted waste disposal site to leave waste codes in place as were established with the initial footprint. The theory is even though the constituents may not be detected with every analysis, the possibility exists that they could be detected in any spot testing that may be conducted on the waste stream.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Todd Mc Nulty', with a large, sweeping loop at the end.

Todd Mc Nulty
Vice President - Engineering

**LAND DISPOSAL RESTRICTED AND PROHIBITED WASTE
NOTICE AND CERTIFICATION**

Approval # 3127

The waste identified on manifest # ME7136746 and bearing the EPA Hazardous Waste Code(s) D002, D007, D008, 0010, 0030 is subject to the land restrictions of 40 CFR Part 268. The waste does not meet the treatment standards specified in Part 268 subpart D or does not meet the prohibitions specified in 268.32 or RCRA section 3004(d). Check all boxes that apply:

1. TOXICITY CHARACTERISTIC

This shipment contains the following characteristic waste(s) not conforming to treatment standards per 40 CFR Part 268.

Please check the appropriate category:

- ☒ Wastewater (containing <1% TOC and <1% filterable solids)
☐ Non-Wastewater

Waste Code	Constituent	Waste Code	Constituent
<input type="checkbox"/> D004	Arsenic	<input type="checkbox"/> D027	1,4-Dichlorobenzene
<input type="checkbox"/> D005	Barium	<input type="checkbox"/> D028	1,2-Dichloroethane
<input type="checkbox"/> D006	Cadmium	<input type="checkbox"/> D029	1,1-Dichloroethylene
<input checked="" type="checkbox"/> D007	Chromium	<input type="checkbox"/> D030	2,4-Dinitrotoluene
<input checked="" type="checkbox"/> D008	Lead	<input type="checkbox"/> D031	Heptachlor (& epoxide)
<input type="checkbox"/> D009*	Mercury	<input type="checkbox"/> D032	Hexachlorobenzene
<input type="checkbox"/> D010	Selenium	<input type="checkbox"/> D033	Hexachlorobutadiene
<input type="checkbox"/> D011	Silver	<input type="checkbox"/> D034	Hexachloroethane
<input type="checkbox"/> D018	Benzene	<input type="checkbox"/> D035	Methyl ethyl ketone
<input type="checkbox"/> D019	Carbon tetrachloride	<input type="checkbox"/> D036	Nitrobenzene
<input type="checkbox"/> D020	Chlordane	<input type="checkbox"/> D037	Pentachlorophenol
<input type="checkbox"/> D021	Chlorobenzene	<input type="checkbox"/> D038	Pyridine
<input type="checkbox"/> D022	Chloroform	<input type="checkbox"/> D039	Tetrachloroethylene
<input type="checkbox"/> D023	o-Cresol	<input type="checkbox"/> D040	Trichloroethylene
<input type="checkbox"/> D024	m-Cresol	<input type="checkbox"/> D041	2,4,5-Trichlorophenol
<input type="checkbox"/> D025	p-Cresol	<input type="checkbox"/> D042	2,4,6-Trichlorophenol
<input type="checkbox"/> D026	Cresol	<input type="checkbox"/> D043	Vinyl chloride

*D009 Mercury Subcategory (Non-Wastewater only)

2. CHARACTERISTIC OF CORROSIVITY (D002)

- ☒ This shipment contains a corrosive waste as defined in 40 CFR 261.22(a) and bears the EPA Hazardous Waste Number of D002.

3. T.C. ORGANICS (D018-D043)

CORROSIVE WASTES (D002)

UNDERLYING HAZARDOUS CONSTITUENTS

Chromium
Lead

☐ No Underlying Hazardous Constituents

☒ Underlying Hazardous Constituents indicated above

4. WASTE CODE K062

This shipment contains K062 hazardous waste, not conforming to treatment standards per 40 CFR Part 268.

Please check the appropriate category:

- ☐ Wastewater
☐ Non-Wastewater

5. WASTE CODES F006 & F019 (40 CFR 268.41)

This shipment contains F006 and/or F019 listed hazardous waste not conforming to treatment standards per 40 CFR Part 268.

Please check the appropriate category:

- ☐ F006 Wastewater
☐ F006 Non-Wastewater

- ☐ F019 Wastewater
☐ F019 Non-Wastewater

6. CALIFORNIA LIST PROHIBITION LEVELS (40 CFR 268.32)

This shipment contains the following constituents at levels greater than or equal to prohibition levels given below:

- ☐ 1,000 mg/kg Halogenated Organic Compounds (HOCs)
☐ 50 ppm PCBs (liquid wastes)
☒ 134 mg/L Nickel (liquid wastes)
☐ 130 mg/L Thallium (liquid wastes)

I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste, and I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification, including a possibility of a fine and/or imprisonment.

[Signature]
Authorized Signature

Apollo Plating
Name of Generator

MID 052 035 425
Generator EPA ID#

6-25-98

Date

PLEASE SEND ORIGINAL WITH SHIPMENT
GENERATOR MUST RETAIN A COPY FOR FILES

HAZARDOUS WASTE

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL
IF FOUND, CONTACT THE NEAREST POLICE OR PUBLIC SAFETY
AUTHORITY, OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY

ACCUMULATION START DATE 9-10-98 E.P.A. WASTE NO. F006

D.O.T. PROPER SHIPPING NAME RQ. HAZARDOUS WASTE SOLID. N.O.S.

(F006 CHROMIUM)

9 PG III

U.N. OR
N.A. NO.

NA3077

GENERATOR NAME APOLLO PLATING

ADDRESS 15765 STURGEON

CITY ROSEVILLE STATE MT 18066

E.P.A. I.D. NO. MTD052035425 MANIFEST DOCUMENT NO.

PROFILE NO. #103610 DRUM NO. F006 FILTER CAKE

HAZARDOUS WASTE / HANDLE WITH CARE

FP-2

WASTE MANAGEMENT DEPARTMENT

FILTER CAKE ROLL-OFF BOX INSPECTION

This inspection is to be conducted once per week by waste treatment department personnel. The form is to be filled out completely by the individual who conducts this inspection.

DOOR TIGHTLY CLOSED YES/NO (if no corrective actions taken)
☒ ☐

INSPECTORS INITIALS JD

LINER IN PLACE ☒

INSPECTORS INITIALS JE

RAIN COVER IN PLACE ☒

INSPECTORS INITIALS JE

HAZARDOUS WASTE TAG
ATTACHED AND DATED ☒

INSPECTORS INITIALS JE

EMPLOYEE HAZARDOUS WASTE TRAINING

RECORDS

PERSONNEL MUST RECEIVE INITIAL TRAINING WITHIN SIX MONTHS AFTER THE DATE OF THEIR EMPLOYMENT OR ASSIGNMENT TO A JOB THAT IS RELATED TO THE MANAGEMENT OF HAZARDOUS WASTE. AFTER THE INITIAL TRAINING FACILITY PERSONNEL MUST BE TRAINED ANNUALLY.

EMPLOYEE NAME: ARGYRI P IOANNOU

JOB TITLE: ENVIRONMENTAL MANAGER

JOB DESCRIPTION: MONITORING THE PRETREATMENT SYSTEM FOR COMPLIANCE
IN CHARGE OF HAZARDOUS WASTE FOR THE FACILITY
EMERGENCY CORDINATOR
STORM WATER CERTIFY OFFICER

INITIAL TRAINING: DEC, 1995

ANNUAL TRAINING: DEC, 1998

TYPES AND AMOUNT OT TRAINING:
ARGYRI P IOANNOU HAD ON THE JOB TRAINING FOR

COMMUNICATIONS SYSTEMS
EMERGENCY PROCEDURES
RESPONSE TO FIRES OR EXPLOSIONS
SHUTDOWN OF OPERATIONS,
RESPONSE TO UNPLANNED SUDDEN OR NON-SUDDEN RELEASES OF HAZARDOUS WASTE
CONSTITUENTS OT AIR, SOIL OR SURFACE WATER
CONTINGENCY PLAN IMPLEMENTATION
SLUG/SPILL PREVENTION PLAN

ONE DAY CLASSROOM TRAINING ON

MATERIAL SAFETY DATA SHEETS
RIGHT -TO- KNOW
HAZARDOUS MATERIALS
CONFINED SPACES ENTRY
STORM WATER OPERATOR AND CERTIFY OFFICER
RCRA/PART III COMPLIANCE

SIGN: Argyri P Ioannou.
F-0400-09-68
REV 8/98

EMPLOYEE HAZARDOUS WASTE TRAINING

RECORDS

PERSONNEL MUST RECEIVE INITIAL TRAINING WITHIN SIX MONTHS AFTER THE DATE OF THEIR EMPLOYMENT OR ASSIGNMENT TO A JOB THAT IS RELATED TO THE MANAGEMENT OF HAZARDOUS WASTE. AFTER THE INITIAL TRAINING FACILITY PERSONNEL MUST BE TRAINED ANNUALLY.

EMPLOYEE NAME TODD MCNULTY

JOB TITLE: VICE PRESIDENT OF ENGINEERING

JOB DESCRIPTION:

MACHINE REPAIR
ELECTRICIAN
EQUIPMENT ENHANCEMENTS
GENERAL MAINTENANCE
TOOL DESIGN

INITIAL TRAINING: JAN 1995

ANNUAL TRAINING: JAN 1998

TYPES AND AMOUNT OT TRAINING:

ON THE JOB TRAINING FOR SIX MONTHS

EMERGENCY SYSTEMS (COMMUNICATION & ALARMS)
EMERGENCY EQUIPMENT (WATER MAINS, GLOVES, BREATHING
APPARATUS, FIRE EXTINGUISHERS).
RESPONSE TO FIRES OR EXPLOSIONS
SHUT DOWN OPERATIONS
CONTINGENCY PLAN IMPLEMENTATION

ONE DAY CLASSROOM TRAINING ON

HAZARDOUS MATERIALS
RIGHT TO KNOW
CONFINED SPACES ENTRY

SIGN: 

EMPLOYEE HAZARDOUS WASTE TRAINING

RECORDS

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JOB DESCRIPTION:

DUMP FILTER CAKE FROM FILTER PRESS
DRY FILTER CAKE
SWEEP AROUND WASTE TREATMENT
TRANSFERRED FILTER CAKE TO ROLL-OFF BOX
INSPECT MIXERS ON THE WASTE TREATMENT
GENERAL HOUSEKEEPING

INITIAL TRAINING: JULY, 1998

ANNUAL TRAINING: JULY, 1999

TYPES AND AMOUNT OT TRAINING: DESHONE LAWRENCE
HAD 2 MONTHS ON THE JOB TRAINING ON THE
EMERGENCY PROCEDURES
COMMUNICATIONS
CONTIGENCY PLAN
SLUG/SPILL PREVENTION PLAN
ONE DAY CLASSROOM INSTRUCTIONS VIDEOS ON
HOW TO HANDLE HAZARDOUS MATERIALS
CONFINED SPACES.
MATERIAL SAFETY DATA SHEETS

SIGN: *Deshone Lawrence*

F-0400-09-68
REV 8/98

EMPLOYEE HAZARDOUS WASTE TRAINING RECORDS

PERSONNEL MUST RECEIVE INITIAL TRAINING WITHIN SIX MONTHS AFTER THE DATE OF THEIR EMPLOYMENT OR ASSIGNMENT TO A JOB THAT IS RELATED TO THE MANAGEMENT OF HAZARDOUS WASTE. AFTER THE INITIAL TRAINING FACILITY PERSONNEL MUST BE TRAINED ANNUALLY.

EMPLOYEE NAME: JOHN DEAN

JOB TITLE: WASTE TREATMENT TECHNICIAN

JOB DESCRIPTION:

DAILY EFFLUENT ANALYSIS
DAILY FILTER CAKE DUMPING
FILTER CAKE DRYING
INSPECTION OF ROLL OFF WEEKLY
WASTE TREATMENT CHEMICAL MAKE UP
TRANSFERRING HAZARDOUS WASTE TO THE ROLL OFF BOX
RIGHT- TO - KNOW LAW
HANDLING OF HAZARDOUS MATERIALS

INITIAL TRAINING: MARCH , 1995

ANNUAL TRAINING: MARCH , 1998

TRAINED BY: ENVIRONMENTAL MANAGER

TYPES AND AMOUNT OT TRAINING: THE ABOVE EMPLOYEE HAS BEEN TRAINED FOR THREE (3) MONTHS ON THE FOLLOWING TOPICS.

EMERGENCY PROCEDURES
EMERGENCY SYSTEMS (SUCH AS COMMUNICATION SYSTEMS)
RESPONSE TO FIRES OR EXPLOSIONS
CONTINGENCY PLAN
SLUG/SPILL PREVENTION PLAN
MATERIAL SAFETY DATA SHEETS

SIGN: 

STATE OF MICHIGAN



JOHN ENGLER, Governor
DEPARTMENT OF ENVIRONMENTAL QUALITY

"Better Service for a Better Environment"

HOLLISTER BUILDING, PO BOX 30473, LANSING MI 48909-7973

INTERNET: www.deq.state.mi.us

RUSSELL J. HARDING, Director

REPLY TO:

DETROIT OFFICE
SUITE 3600
300 RIVER PLACE
DETROIT MI 48207

August 25, 1998

Ms. Argyri Ioannou
Environmental Manager
Apollo Plating, Inc.
15765 Sturgeon
Roseville, MI 48066

Dear Ms. Ioannou:

SUBJECT: MID 052 035 425

On August 5, 1998, staff of the Department of Environmental Quality (DEQ) conducted an inspection of Apollo Plating, Inc., (hereafter Facility), located at 15765 Sturgeon, Roseville, Michigan, to evaluate compliance of that facility with Part 111, Hazardous Waste Management, Michigan Compiled Laws (MCL) 324.11101 et seq., and Part 121, Liquid Industrial Wastes, MCL 324.12101 et seq., of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA); Subtitle C of the federal Resource Conservation and Recovery Act of 1976, as amended, and any administrative rules or regulations promulgated pursuant to these Acts.

Not all required areas of compliance were reviewed by DEQ staff during the abbreviated inspection. Subsequently, be advised that even though not all areas were inspected and reviewed, the Facility must comply will all applicable requirements. The Facility is urged to review its activities using the enclosed inspection form, and correct any deficiencies identified.

As a result of the inspection, staff of the DEQ have determined that the above facility is in violation of the following:

1. The facility must maintain a copy of the waste evaluation on-site for three years from the date that the waste was last sent to off-site or on-site treatment, storage or disposal. (Rule 307(1): 40 CFR 262.40(c)), and a facility is required to retain on-site any records to support the determination(s), either from knowledge of the waste or from test results, that the waste is or is not restricted. (Rule 311(1): 40 CFR 268.7(a)(5)). The waste evaluation for the waste nitric stripper was not on site at the time of inspection, but was faxed to the Facility

during the inspection. Please ensure that copies of characterizations are kept on site, as required, in the future. **No further response is required.**

2. The Land Disposal Restriction (LDR) notice must include:
(Rule 311(1): 40 CFR 268.7(a)(2))

- a) The waste analysis data, where available. As noted above, (item 1), the characterization for the waste nitric stripper was not on site at the time of inspection. It was faxed to the Facility during the inspection. Please ensure that copies of characterizations are kept on site, as required, in the future, and provided, as required, with LDR notifications. **No further response is required.**
- b) The waste constituents that the treater will monitor, if monitoring will not include all regulated constituents, for F001 - F005, F039, D001, D002, D012-D043. The LDR forms corresponding to manifest MI7136746 showed that underlying hazardous constituents were to be addressed on the form, but nothing was listed. Please correct this form to list the underlying hazardous constituents, or correct this form to show that underlying hazardous constituents do not have to be addressed. If the Facility decides that the underlying hazardous constituents do not have to be addressed, please provide the appropriate explanation (example: the D002 waste will be treated in a Clean Water Act system (such as a wastewater treatment system with a permitted discharge). Please provide a copy of the correct LDR form to this office and to the treatment, storage and disposal facility.

3. The date upon which each period of accumulation began must be marked and visible for inspection on each hazardous waste container.
(Rule 306(1)(b): 40 CFR 262.34(a)(2)), and while being accumulated on-site, each container of hazardous waste must have the words "Hazardous Waste" clearly marked or labeled on it. (Rule 306(1)(c): 40 CFR 262.34(a)(3)), and while being accumulated on-site, each container of hazardous waste shall have the hazardous waste number clearly marked or labeled on it. (Rule 306(1)(b)). The roll off box and the hopper used to collect the filter press cake were unmarked. Please mark these containers with the words 'hazardous waste', the waste code(s) and the date accumulation began, and document this to this office.
4. A container holding hazardous waste must always be closed except when adding or removing waste as required in 40 CFR 265.173(a).
(Rule 306(1)(a): 40 CFR 26.34(a)(1)). The hopper was observed open during the inspection. This container must be kept closed when not in use. Please document that this container has been closed.
5. Weekly container area inspections for leaks and deterioration must be documented. (Rule 306(1)(a)(i)). The container inspections were being done on a daily basis but were not being documented. Please provide a copy of a checklist

or other documentation that the container storage area is being inspected at least weekly.

6. Documentation of weekly container area inspections for leaks and deterioration shall be maintained on-site for three years from the date of the inspection. (Rule 306(1)(a)(i)). As noted above (item 5), the container storage areas must be inspected at least weekly, and documentation of the inspections must be kept. Please verify that the documentation for container inspections will be maintained on site as required.
7. Personnel training records must be designed to ensure that facility personnel can respond to emergencies by being trained in emergency procedures, emergency equipment and emergency systems, including where applicable: (Rule 306(1)(d): 40 CFR 262.34(A)(4) which refers to 40 CFR 265.16(a)(3)).
 - a) Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment;
 - b) Key parameters for automatic waste feed cut-off systems;
 - c) Communications or alarm systems;
 - d) Response to fires or explosions;
 - e) Response to groundwater contamination incidents; and
 - f) Shutdown of operations.

Please document that personnel training has been conducted at the Facility which meets the above requirements and includes training in the Facility contingency plan (see items 9-14, below). Please also review the personnel training handout provided with this letter for additional personnel training requirements not reviewed during the inspection.

8. The facility shall maintain records that document the training was given to and completed by facility personnel as required in 40 CFR 265.16(d)(4). (Rule 306(1)(d): 40 CFR 262.34(a)(4)). As noted in item 7, above, personnel training must be provided to Facility personnel, and this training must be documented. Please provide copies of training records to this office.
9. Arrangements must be made with local police, fire and emergency response teams to familiarize them with the layout of the facility, properties of hazardous waste handled at the facility and associated hazards, places where facility personnel would normally be working, entrance to roads inside the facility and possible evacuation routes. Additionally, arrangements must be made to familiarize local hospitals with the properties of hazardous waste handled at the facility, and the type of injury or illnesses which could result from fire, explosion or

releases at the facility as required in 40 CFR 265.37(a)&(b). Additionally, the facility must document where state and/or local authorities decline to enter in such arrangements. (Rule 306(1)(d): 40 CFR 265.37(a)&(b)). Please document that the Facility has made the appropriate arrangements with local authorities (at a minimum, the local fire department, the local police department, and a local hospital or clinic). Please also see items 10(b) and 14, below, for further requirements involving local authorities.

10. The contingency plan must contain the following information:
 - a) Actions personnel will take to respond to fires, explosions, or unplanned release of hazardous waste. (Rule 306(1)(d): 40 CFR 265.52(a & b)). Only the actions personnel were to take in the event of an unplanned release were identified in the Facility contingency plan.
 - b) Arrangements made or attempted to be made with local police departments, fire departments, hospitals, contractors, state and local emergency responders for emergency services. (Rule 306(1)(d): 40 CFR 265.52(c)) & (40 CFR 265.37(a)&(b)). Please also see item 9, above, and item 14, below. This information must be documented in the Facility contingency plan.
 - c) Name, addresses and phone (office and home) numbers of all persons qualified to act as the emergency coordinator(s) and specify who is primary and then the alternates. (Rule 306(1)(d): 40 CFR 265.52(d)). The list of emergency coordinators for the Facility was out of date. This list must be updated and must include the above information.
 - d) List of the emergency equipment at the facility, including location, physical description and capabilities. (Rule 306(1)(d): 40 CFR 265.52(e)). The physical description of the emergency equipment was not adequate. Items such as gloves, etc., were listed but not described (such as what chemicals the gloves are resistant to, etc.).
 - e) An evacuation plan for personnel which includes the signal(s) to be used to begin evacuation, evacuation routes and alternate evacuation routes. (Rule 306(1)(d): 40 CFR 265.52(f)). The evacuation plan in the Facility contingency plan did not include primary and alternate evacuation routes (such as a map of the routes).

Please provide a copy of a corrected Facility contingency plan to this office. Please also review the additional contingency plan handout information provided with this letter.

11. The emergency coordinator(s) must be familiar with all aspects of the facility's contingency plan, all operation and activities of the facility, the location and characteristic of the waste handled, the location of all records within the facility, the

facility layout, and emergency procedures as required in 40 CFR 265.55. (Rule 306(1)(d): 40 CFR 265.55). As noted in item 10(c), above, the emergency coordinators listed were out of date and some were not even employed at the Facility at the time of inspection. Please update this list and ensure that the emergency coordinators meet the above requirements.

12. The emergency coordinator(s) must have the authority to carry out the contingency plan and emergency procedures as required in 40 CFR 265.55. (Rule 306(1)(d): 40 CFR 265.55). As noted in item 10(c), above, the emergency coordinators listed were out of date and some were not even employed at the Facility at the time of inspection. Please update this list and ensure that the emergency coordinators meet the above requirements.
13. The facility is required to amend the contingency plan and emergency procedures whenever they fail in an emergency, when there are changes in the regulations, the emergency coordinators or the emergency equipment as required in 40 CFR 265.54. (Rule 306(1)(d): 40 CFR 265.54). As noted in item 10(c), above, the emergency coordinators listed were out of date and some were not even employed at the Facility at the time of inspection. Please update this list, and ensure that the list of emergency coordinators is updated in the future, as required.
14. Copies of the contingency plan and emergency procedures shall be kept on-site and sent to the local emergency organizations, specifically the local police departments, fire departments, hospitals, and state and local emergency response teams that may be called upon to provide emergency services as required in 40 CFR 265.53. (Rule 306(1)(d): 40 CFR 265.53). It is recommended that a copy of the Facility contingency plan be provided to this office for review and approval prior to submitting the plan to local authorities (at a minimum, the local fire department, the local police department, and a local hospital or clinic). When the contingency plan is completed and approved, documentation must be provided to show that the plan was submitted to local authorities (such as certified mail receipts). Please submit a copy of the corrected Facility contingency plan to this office, and, please provide documentation of submittal when the contingency plan is submitted to local authorities.

The following comment/issue, which is not a specific violation, was identified:

- A. It was noted that the waste codes used for the nitric acid stripper were D002 (corrosive), D007 (chrome), D008 (lead), 001D (copper) and 003D (zinc). Review of the analysis for this waste material indicated that the waste did not appear to be hazardous for lead (D008), copper (001D) and zinc (003D). It was not clear if the Facility had additional information (either knowledge or testing) which supported the characterization of the waste nitric stripper as being hazardous for these waste codes. Please clarify this situation.

August 25, 1998

The Facility must respond to the violations, and is requested to respond to the comment/issue noted in this letter. Please submit documentation to this office regarding those actions taken to address the violations and the comment/issue by September 28, 1998. The DEQ will evaluate the response, determine the Facility's compliance status, and notify you of this determination.

This letter of warning does not preclude nor limit the DEQ's ability to initiate any other enforcement action, under state or federal law, as deemed appropriate.

Enclosed, for your information, is a handout explaining the Pollution Incident Prevention Plan required for certain facilities under Part 31, Water Resources Protection, MCL 324.3101 et seq. of the NREPA; a short information sheet on waste minimization; an information sheet on recycling fluorescent bulbs; and information on polychlorinated biphenyl (PCB) ballasts.

If you have any questions, please feel free to contact me.

Sincerely,



Jeanette M. Noechel
Environmental Quality Analyst
Waste Management Division
313-392-6524

drs

Enclosures

cc: Dr. Benedict N. Okwumabua, WMD, DEQ

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*                               RCRIS: Notification View Screen 1 of 6                               *
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*   EPA ID: MID052035425      Other ID:
*   Source of Information ( N/E/S ):  N
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*   Enter-Continue                      F3-Exit
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Source S Does Not Exist for Handler MID052035425

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Apollo Plating
Drop date 8/5/98
Drop M Moessel
intended
8/12/98
DWG

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*                               RCRIS: Notification View Screen 2 of 6                               *
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*EPA ID: MID052035425      Other ID:                               Merge Send: Y      *
*Date Received(MMDDYY): 012981   Source( N/E/S ): N Non-Notifier Flag:      *
*Date Acknowledged (MMDDYYYY):                               Send Acknowledgement:  *
*Name of Installation: APOLLO PLATING INC      *
*                               Installation Location Address                               *
*Streets: 15765 STURGEON      *
*City: ROSEVILLE      State: MI      Zip: 48066      *
*County Code: 099      County Name: MACOMB      *
*                               Installation Mailing Address                               *
*Streets: 15765 STURGEON      *
*City: ROSEVILLE      State: MI      Zip: 48066      *
*                               Contact Information                               *
*   Last Name      First Name      Title      Phone      Address(M,L,O) *
* PEDROTTE JOAN NOV CHARLES AGYRI      ENV MGR.      810 7770070      M      *
*Streets: 15765 STURGEON      *
*City: ROSEVILLE      State: MI      Zip: 48066      *
*Land Type:      *
*****
* Enter-Continue      F1-Previous Screen      F3-Exit      *
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*                               RCRIS: Notification View Screen 3 of 6                               *
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* EPA ID:  MID052035425      Other ID:                               Source:  N                               *
*
* Owner Sequence Number:      1                                       *
* Ownership:  CHARLES E PEDROTTI JIM GRIMES, SR.      Type of Owner:  P                               *
*
*                               Address of Owner/Operator                               *
*
* Street: ADDRESS NOT REPORTED 15765 STURGEON                               *
* City:  CITY NOT REPORTED /RSUL. State: AK Zip Code 99098                               *
* Phone: 3125551218                               MI                               43066                               *
*                               810 799 6070                               *
* Current/Previous Indicator: CO Change Date(MMDDYY):                               *
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* Enter-Continue  F1-Previous Screen  F3-Exit  F5-Curr. Owner  *
* F6-Prev. Owner  F8-Help  F9-First  F10-Next  *
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*                               RCRIS: Notification View Screen 4A of 6                               *
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* EPA ID:  MID052035425      Other ID:                               Source:  N                               *
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*                               RCRA Reg   RCRA Reg   State Reg   State Reg                               *
* Waste Activity              Type    Status    Desc        Status    Desc                               *
* -----                    - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - *
* HW Generator:              1          R                               *
* HW TSD:                                                             *
* HW Transporter:                                                    *
*   Transport Mode:  Air:          Rail:          Highway: X      Water:          *
*                   Other:                                                *
* HW Burner/Blender:                                                *
* NHW Used Oil Recycler:                                            *
* -----                                                            *
* Underground Injection Control:                                    *
* Recycler:                                                         *
*                                                                                                     *
*****
* Enter-Continue      F1-Previous Screen      F3-Exit      F8-Help      *
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CONTINGENCY PLAN

FOR

**APOLLO PLATING, INC.
15765 STURGEON
ROSEVILLE, MICHIGAN 48066**

APOLLO PLATING, INC.

CONTINGENCY PLAN

This Contingency Plan has been prepared in accordance with the requirements of 40 CFR 264(D) and Act 451 to establish the necessary planned procedures to be followed in the event of an emergency situation at the facility, such as fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to the air, soil, or surface water.

As required by 40 CFR 264.53 and Act 451, a copy of this Contingency Plan (and all amendments to the plan) is maintained at the facility and has been submitted to the local police department, fire department, and local emergency response teams that may be called upon to provide emergency service.

1. GENERAL INFORMATION [40 CFR 264.51]

The plans and procedures described herein have been prepared in accordance with the applicable regulations and have been designed to minimize hazards to human health and the environment from any unplanned, sudden or non-sudden release of hazardous waste or hazardous waste constituents to the air, soil, or surface water. The procedures established in this plan have been developed to protect Apollo Plating employees, properties, and the general public and will be implemented by plant personnel in the event of a potential or actual release of hazardous wastes or hazardous waste constituents which may threaten human health or the environment.

Apollo Plating, Inc. is located at 15765 Sturgeon, Roseville, Michigan. The facility performs chrome, nickel and zinc electroplating. The facility stores hazardous waste in a closed roll-off outside of the facility prior to disposal to an off-site facility.

2. EMERGENCY COORDINATORS [40 CFR 264.52(d) and 264.55]

At all times there is at least one employee, either on the facility premises or on call and within reasonable travel distance of the facility with the responsibility for coordinating all emergency response measures. The list of Emergency Coordinators is contained in Table 1. Qualified persons have been designated as the primary and alternate Emergency Coordinators. Their names, addresses, and telephone numbers are arranged in the order in which they would assume the responsibilities of Emergency Coordinator.

If an emergency situation develops at the facility, the discoverer must immediately contact the primary Emergency Coordinator or the alternate Emergency Coordinator if the primary Emergency Coordinator is unavailable. The primary and alternate Emergency Coordinators are thoroughly familiar with all aspects of the facility's contingency plan, all operations and activities of the facility, the location of all records within the facility, and the facility layout. The Emergency Coordinators have complete authority to commit resources of the company that may be needed to carry out the

Contingency Plan. The Emergency Coordinator's responsibilities are specified under the emergency response procedures contained in this plan.

3. EMERGENCY RESPONSE PROCEDURES

The following general procedures have been established for implementation by plant personnel and the Emergency Coordinator in order to efficiently respond to the release of hazardous waste or hazardous waste constituents which could threaten human health or the environment.

All emergencies require prompt and decisive action. In the event of any emergency, an established set of procedures will be followed. These procedures will be followed as closely as possible. In specific emergency situations, however, the Emergency Coordinator may deviate from established procedures to provide a more effective plan for bringing the situation under control.

In the event of an emergency, Facility Person/Personnel that discover the emergency will leave the immediate area and contact the Emergency Coordinator with the following information:

- Person(s) injured and seriousness of the emergency
- Location of the emergency involved
- Type of emergency (chemical spill, fire or explosion)
- The extent of the emergency

A. **Notification.** In the event of an emergency situation the Emergency Coordinator will be notified first by facility personnel; and subsequently, appropriate federal, state or local agencies, and fire or police department will be notified by the Emergency Coordinator.

B. **Identification of Hazardous Materials [40 CFR 264.56(b)].** The Emergency Coordinator will immediately identify the type, exact source, amount and extent of any released materials. The Emergency Coordinator is familiar with the facility and the types of wastes which are handled. The initial identification will be made by observation of the materials involved, the source, and the location of the release. The tanks, piping, and containers are labeled to facilitate the identification of released materials. If visual identification cannot be made, samples of the released materials will be identified by chemical analysis.

C. **Assessment [40 CFR 264.56 (b) and (d)].** The Emergency Coordinator will assess possible hazards, both direct and indirect, to human health or the environment that may result from the release of the identified material or from the fire or explosion. The assessment will consider the effects of any gases that may be generated, the effects of hazardous surface runoff from water or chemical reagents used to control the fire, and the effects of any chemical or physical reactions on equipment or structures.

If the Emergency Coordinator's assessment indicates that evacuation of local areas may be advisable, the appropriate local authorities will be immediately notified. The Emergency Coordinator will assist these authorities in deciding whether evacuation is indicated and what areas may need to be

evacuated. The DEQ Spill Response Center (see Table 2) will also be immediately notified, and the following information will be provided:

- ◇ name and telephone number of reporter
- ◇ name and address of facility
- ◇ time and type of incident (e.g., release, fire, explosion)
- ◇ name and quantity of materials involved, to the extent known
- ◇ extent of injuries, if any, and
- ◇ possible hazards to human health or the environment, outside of the facility

D. Control Procedures [40 CFR 264. 52(a)]. All emergencies require prompt and deliberate action. Whenever there is an imminent or actual emergency situation where the potential or actual release of hazardous materials may threaten human health or the environment:

- The plant personnel who discover the situation will notify the Emergency Coordinator or alternate by telephone.
- The Emergency Coordinator or alternate will contact the appropriate spill cleanup contractors, and state or local agencies, if their assistance is needed.
- In the event that an individual or individuals have come in contact with acids or alkalis, plant personnel will immediately assist the victim to the emergency eyewash or shower where the affected area will be rinsed with water. Other injured personnel will also receive immediate first aid or medical attention. If necessary, the hospital or clinic will be notified immediately. The safety of personnel and other individuals will be the first concern of the Emergency Coordinator.
- All emergency response personnel will utilize personal protective equipment including gloves, boots, goggles, or face shields, aprons, and other equipment appropriate to the emergency.

E. Prevention of Recurrence or Spread of Fires, Explosions or Releases [40 CFR 264.56(e)]. During an emergency, the Emergency Coordinator must take all reasonable measures necessary to ensure that fires, explosions or releases do not recur or spread to other areas of the plant.

Shut off pumps, or valves if required to stop the releases;
Actuate sump pumps to transfer accumulated runoff into available tanks; and
Spread suitable neutralizing agents on contained spills.

F. Storage and treatment of Released Materials [40 CFR 264.56(g)]. Immediately after an emergency the Emergency Coordinator will make arrangements for the treatment, storage, or disposal of recovered waste or any other contaminated materials.

The Emergency Coordinator will determine the regulatory status of the released substance and associated spill cleanup materials. This determination will be made according to the following guidelines:

If the material is from a spill of a listed hazardous waste, defined in 40 CFR 261 or Act 451, then the cleanup materials, spill residues, and other contaminated materials must be managed as hazardous wastes.

4. EMERGENCY EQUIPMENT [40 CFR 264.32 and 264.52]

A. Internal Communication. Internal communication is provided by means of the facility telephone, and paging systems.

B. External Communication. External communication is also provided through the facility telephone system and paging systems.

C. Access to Communication. All facility personnel have prompt access to the telephone system, as they are located in areas where personnel would be carrying out their duties.

D. Emergency Equipment. Portable fire extinguishers (classified for Class A), eyewash/personal shower, spill response equipment (such as rubber gloves [capable of withstanding all acids and alkalis within facility] Nitrile 13", Model 2200N Series, N95 Particulate Respirators for buffing dust, NIOSH Respirators 3M No. 6003 organic vapor and acid gas cartridge, rubber aprons [capable of withstanding all acids and alkalis within facility], safety glasses/face shields, and absorbents), telephone, first aid kit and evacuation routes are located throughout the facility. Their locations in the facility are illustrated on the Site Map.

E. Emergency Equipment Inspection and Maintenance. All facility fire protection equipment, spill control equipment, and decontamination equipment are inspected, tested, and maintained on a regular basis to ensure proper operation during an emergency. Records are kept in the Maintenance department.

5. COORDINATION AGREEMENTS [40 CFR 264.52(c) and 264.37]

Copies of the Contingency Plan are provided to emergency response agencies via return receipt mail in order to familiarize them with the facility layout, the properties of materials handled, locations of working area, access routes into and within the facility, possible evacuation routes from the facility, and types of injury or illness which could result from releases of materials at the facility.

This information is submitted to:

Michigan Pumping Service
605 Harrison St.
Trenton, MI 48183
24 Hour Service: (734) 675-0225

Fax: (734) 675-0948

Fire Chief, City of Roseville
18750 Common Road
Roseville, MI 48066

Police Chief, City of Roseville
29753 Gratiot
Roseville, MI 48066

Administrator
Bi-County Hospital
13355 E. Ten Mile Rd.
Warren MI, 48089

A list of hazardous materials that are being stored or used in the facility has been submitted to the local authorities and state emergency response teams with a layout of the facility. A cover letter inviting the above groups to visit the facility has been mailed.

6. EVACUATION PLAN

Supervisors will prepare a list of employees present in the assembly areas and those individuals that should be present but are not and will present the list to the Emergency Coordinator or his/her alternates. Accounting for the presence of visitors will be the responsibility of the employees they are seeing. The accounting for the presence of contractors will be the responsibility of those personnel supervising the individual contracts. Truck drivers will be the responsibility of the supervisor where the truck is loading or unloading:

- * The signal for plant evacuation will be an announcement via the public address system, to be given by the Emergency Coordinator or his/her alternate, so facility personnel, visitors and/or contractors can leave the site through Exits 1, 2 or 3 as depicted on the Site Safety Map. This announcement will also inform personnel as to which Exit (1, 2 or 3) is the designated gathering point.
- * All traffic within the plant will cease, to allow safe exit of personnel and movement of emergency equipment.
- * All personnel, visitors and contractors will immediately leave through the exit gate.
- * No persons shall remain or re-enter the location unless specifically authorized by the Emergency Coordinator. Those within the emergency perimeter will normally include fire fighting personnel or emergency teams.

All persons will be accounted for by the Emergency Coordinator, who will also choose an alternate exit if the first choice is inaccessible. To assist in this endeavor, the Emergency Coordinator will use the public address system to call the plant personnel to inform them of the nature of the emergency.

- ◇ During exit, the supervisors should attempt to keep his or her group together.
- ◇ Immediately upon exiting through Exits 1, 2 and 3 as depicted on the Site Safety Map, all personnel are to proceed to the announced main gathering point. The Emergency Coordinator or his/her alternate will complete a final list of all personnel at the main gathering point.
- ◇ Contract personnel should also be listed with the name of their company.
- ◇ A final tally of persons will be made by the Emergency Coordinator.
- ◇ No attempt to find persons not accounted for will involve endangering lives of others by re-entry into emergency areas.
- ◇ Determine whether evacuation of the areas surrounding the facility should be initiated. Local emergency response agencies will be immediately contacted, and the Emergency Coordinator will assist these agencies if it is determined that it is necessary to initiate evacuation; and
- ◇ Give personal, verbal notification to indicate that the facility is safe and cleared for re-entry.

7. REQUIRED REPORTS [40 CFR 264.56 (i) and (j)]

In the event of an emergency situation that requires implementation of the contingency plan, the Emergency Coordinator must make the following notifications:

- Record in the facility's operating record the time, date, and description of any incident that requires the implementation of this plan.
- Notify the EPA Regional Administrator and the MDEQ director that the facility has complied with the following provisions:
 - No waste that may be incompatible with the released materials has been (or will be) stored, treated or disposed of in the affected area(s) until cleanup procedures have been completed.
 - All emergency equipment listed in this plan has been (or will be) cleaned and fit for its intended use prior to resumption of operations.
- Within 15 days after the incident, submit a written report to the EPA regional administrator. In addition to these reporting requirements for state and federal authorities Apollo Plating, Inc. also has internal reporting requirements. The following incidents

require that an incident report be completed and returned to the owner within 5 working days and made a part of the operating record.

All fires

Unusual gas or vapor releases

Chemical spills of more than 10 gallons or smaller volumes if highly toxic materials are involved.

All injuries except minor cuts and bruises (all burns and chemical irritations).

All emergency equipment damage due to malfunction or operating error.

Date: 11-18-98

Argyri P. Ioannou
Argyri P. Ioannou
Environmental Manager

Revised: November 18, 1998

EMERGENCY NOTIFICATION FORM

Plant: _____

Date: _____

Person reporting: _____

Time of call _____

Person contacted: _____

(name)

(title)

(agency)

Telephone number called: _____

Time and duration: _____

Place: _____

Materials with quantities: _____

Released to: _____

(e.g., land, stream, air, groundwater)

Circumstances: _____

(e.g., spill, process upset, equipment failure, emission)

Containment/Removal efforts (e.g., emergency dike, boom, etc.) _____

Extent of injuries, if any: _____

Other details, as applicable: _____

TABLE 1
EMERGENCY NOTIFICATION TELEPHONE NUMBERS

	NAME/ADDRESS	OFFICE PHONE	HOME PHONE
1.	Emergency Coordinators		
	Mrs Argyri P. Ioannou nonresponsive [REDACTED]	(810) 777-0070	nonresponsive
	Todd McNulty (1 st Alternate) nonresponsive [REDACTED]	(810) 777-0070	nonresponsive
	Dave Shove (2 nd Alternate) nonresponsive [REDACTED]	(810) 777-0070	nonresponsive
2.	Spill Cleanup Contractors		
	Michigan Pumping Service 605 Harrison St. Trenton, MI 48183	24 Hour Service Fax	(734) 675-0225 (734) 675-0948
3.	Fire or Police		911
4.	Medical Emergency		
	Bi-County Hospital 13355 E. Ten Mile Rd. Warren MI, 48089		(810) 759-7300
5.	Concentra Medical Centers		(810) 296-2800
	33089 Groesbeck Hwy. Fraser, MI 48026		

TABLE 2
EMERGENCY CONTACTS

INJURY	BI-COUNTY HOSPITAL	(810) 759-7300 OR 911
FIRE/EXPLOSION	ROSEVILLE FIRE DEPT.	(810) 445-5458 OR 911
SPILL	DEQ SPILL RESPONSE CENTER	(800) 292-4706
	DISTRICT HEADQUARTERS	(313) 953-0241
	MICHIGAN PUMPING SERVICE	(734) 675-0225
	DETROIT WATER & SEWERAGE DEPT. SYSTEM CONTROL	(313) 224-4775
	INDUSTRIAL WASTE CONTROL	(313) 935-4491
NATURAL DISASTER	ROSEVILLE POLICE DEPT.	911 (810) 445-5458

RCRA Site Detail

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MI0052035425 APOLLO PLATING INC

ued...

accumulated on-site. See regulations for acute waste.

Universal Waste Activities:		Generated	Accumulated
Description			
Batteries		N	N
DEVICES CONTAINING ELEMENTAL MERCURY		N	N
Lamps		N	Y
MERCURY THERMOMETERS		N	N
Pesticides		N	N
MERCURY SWITCHES		N	N
Thermostats		N	N

State Activities:		
Owner	Type	Description
MI	LIW	REGULATED UNDER ACT 451, PART 121 - LIQUID INDUSTRIAL WASTE (LIW). SITES ARE A LIW GENERATOR, LIW HAULER, OR LIW PROCESSOR. (FOR REGULATION SEE HTTP://WWW.MICHIGANLEGISLATURE.ORG/ THEN UNDER MCL SECTION ENTER 324.12101)

Activity Location: MI Source Type: Biennial Report Seq. Number: 7 Receive Date: 01 MAR 2002 Report Cycle: 2001

Other/Previous Site Name: APOLLO PLATING INC

Location: 15765 STURGEON
Address: ROSEVILLE, MI 48066

Mailing Address: 15765 STURGEON
ROSEVILLE, MI 48066
UNITED STATES

Contact Person: ARGYRI P. IOANNOU
For Source Information: (586) 777-0070 ext. 239
UNITED STATES

Owner (current): JAMES E GRIMES
From: 03/27/1989 To: Type: Private
Phone:

Owner (current): JIM GRIMES SR
From: 08/06/1998 To: Type: Private
Phone:

Operator (current): JAMES E GRIMES
From: 03/27/1989 To: Type: Private
Phone:

Land Type: Private Non Notifier: No Commercial Availability: Unknown Tsd Date:
Accessibility: No. Employees: 0 State District:

NAICS Codes: 332813 Electroplating, Plating, Polishing, Anodizing, and Coloring

RCRA Site Detail

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MI052035425 APOLLO PLATING INC

ued...

Regulated Waste Activities

Hazardous Waste Generator Status - Federal: Large Quantity Generator; State: MI-1 Large Quantity Generator - Generates gt 1,000 kg of hazardous waste in

Transfer Facility:

Other Hazardous Waste Generator Activities

Importer Activity: No
Mixed Waste Generator: No

Transporter Activity: No

TSD Activity: No

Recycler Activity: No

Exempt Boiler and/or Industrial Furnace

Small Quantity Onsite Burner Exemption: No
Smelting, melting, Refining Furnace
Exemption: No

Used Oil Activities

Used Oil Transporter Activity Off-Specification Used Oil Burner: Unknown

Transporter: Unknown
Transfer Facility: Unknown

Used Oil Fuel Marketer Activity

Marketer who directs shipment
off-specification used oil to
off-specification used oil burner: Unknown

Used Oil Processor and/or
Re-refiner Activity

Processor: Unknown
Refiner: Unknown

Marketer who first claims the used
oil meets the specifications: Unknown

Underground
Injection Control: No

Destination Facility for
Universal Waste: Unknown

RCRA Site Detail

Report run on: March 31, 2004 - 12:46 PM

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MD052035425 APOLLO PLATING INC

ued...

any calendar month during a year or a small quantity generator that has more than 6,000 kg of hazardous waste

RCRA Site Detail

Report run on: March 31, 2004 - 12:46 PM

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MI052035425 APOLLO PLATING INC

ued...

accumulated on-site. See regulations for acute waste.

Universal Waste Activities:		
Description	Generated	Accumulated
Batteries	U	U
Lamps	U	U
Pesticides	U	U
Thermostats	U	U

Biennial Report Information

Total Quantity Reported (Tons): Generated: 225 Managed: 0 Shipped: 225 Received: 0

Top 10 GM Forms Summary by Largest Quantity of Hazardous Waste Generated (All quantities are in tons)

Generated	Managed	Onsite Management Methods	Shipped	Offsite Management Methods
17	0			17 H141 - STORAGE, BULKING AND/OR TRANSFER OFF SITE
EPA Waste Codes: F006				
17	0			17 H141 - STORAGE, BULKING AND/OR TRANSFER OFF SITE
EPA Waste Codes: F006				
17	0			17 H141 - STORAGE, BULKING AND/OR TRANSFER OFF SITE
EPA Waste Codes: F006				
17	0			17 H141 - STORAGE, BULKING AND/OR TRANSFER OFF SITE
EPA Waste Codes: F006				
17	0			17 H132 - LANDFILL OR SURFACE IMPOUNDMENT
EPA Waste Codes: F006				
17	0			17 H141 - STORAGE, BULKING AND/OR TRANSFER OFF SITE
EPA Waste Codes: F006				
17	0			17 H141 - STORAGE, BULKING AND/OR TRANSFER OFF SITE
EPA Waste Codes: F006				
17	0			17 H010 - METALS RECOVERY
EPA Waste Codes: F006				
17	0			17 H141 - STORAGE, BULKING AND/OR TRANSFER OFF SITE
EPA Waste Codes: F006				

Activity Location: MI	Source Type: Notification	Seq. Number: 3	Receive Date: 05 FEB 2002
-----------------------	---------------------------	----------------	---------------------------

Other/Previous Site Name: APOLLO PLATING INC

Address:	15765 STURGEON ROSEVILLE, MI 48066
----------	---------------------------------------

Mailing Address:	15765 STURGEON ROSEVILLE, MI 48066
------------------	---------------------------------------

Contact Person: ARGYRI IOANNOU
For Source Information: (586) 777-0070
15765 STURGEON
ROSEVILLE, MI 48066

RCRA Site Detail

Report run on: March 31, 2004 - 12:46 PM

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MID052035425 APOLLO PLATING INC

ued...

Owner (current)

JIM GRIMES SR

From: 08/06/1998 To:

Type: Private

Phone:

Operator (current)

JAMES E GRIMES

From: 03/27/1989 To:

Type: Private

Phone:

Owner (previous)

CHARLES E PEDROTTE

From: 08/04/1998 To: 08/05/1998

Type: Private

Phone:

Land Type: Private

Non Notifier: No

Commercial Availability: Unknown

Tsd Date:

Accessibility:

No. Employees:

State District:

Notes: THIS RECORD IS THE RESULT OF A COMPLETE UPDATE, OF ALL SITE DATA, DURING THE HAZARDOUS WASTE (BIENNIAL) REPORTING CYCLE.

RCRA Site Detail

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MI052035425 APOLLO PLATING INC

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Regulated Waste Activities

Hazardous Waste Generator Status - Federal: Large Quantity Generator; State: MI-1 Large Quantity Generator - Generates gt 1,000 kg of hazardous waste in

Transfer Facility: No

Other Hazardous Waste Generator Activities

Importer Activity: No
Mixed Waste Generator: No

Transporter Activity: No

TSD Activity: No

Recycler Activity: No

Exempt Boiler and/or Industrial Furnace

Small Quantity Onsite Burner Exemption: No
Smelting, melting, Refining Furnace Exemption: No

Used Oil Activities

Used Oil Transporter Activity Off-Specification Used Oil Burner: No

Transporter: No
Transfer Facility: No

Used Oil Fuel Marketer Activity

Marketer who directs shipment off-specification used oil to off-specification used oil burner: No

Used Oil Processor and/or Re-refiner Activity

Processor: No
Refiner: No

Marketer who first claims the used oil meets the specifications: No

Underground Injection Control: No

Destination Facility for Universal Waste: No

RCRA Site Detail

Report run on: March 31, 2004 - 12:46 PM

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MID052035425 APOLLO PLATING INC

ued...

any calendar month during a year or a small quantity generator that has more than 6,000 kg of hazardous waste

RCRA Site Detail

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MID052035425 APOLLO PLATING INC

ued...

accumulated on-site. See regulations for acute waste.

Universal Waste Activities:		Generated	Accumulated
Description			
Batteries		N	N
DEVICES CONTAINING ELEMENTAL MERCURY		N	N
Lamps		N	N
MERCURY THERMOMETERS		N	N
Pesticides		N	N
MERCURY SWITCHES		N	N
Thermostats		N	N

Activity Location:	MI	Source Type:	Biennial Report	Seq. Number:	6	Receive Date:	20 JAN 2000	Report Cycle:	1999
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Other/Previous Site Name: APOLLO PLATING INC

Location: 15765 STURGEON
Address: ROSEVILLE, MI 48066

Mailing Address: 15765 STURGEON
ROSEVILLE, MI 48066

Contact Person: ARGYRI P IOANNOU
For Source Information: (810) 777-0070 ext. 230

Land Type: Bad code - U Non Notifier: No Commercial Availability: Other - U Tsd Date:
Accessibility: No. Employees: State District:

Regulated Waste Activities

Hazardous Waste Generator Status - Federal: Large Quantity Generator; State:

Transfer Facility: Unknown

Used Oil Activities

Other Hazardous Waste Generator Activities

Used Oil Transporter Activity

Off-Specification Used Oil Burner:

Unknown

Importer Activity: Unknown
Mixed Waste Generator: Unknown

Transporter: Unknown
Transfer Facility: Unknown

Used Oil Fuel Marketer Activity

Transporter Activity: Unknown

Used Oil Processor and/or
Re-refiner Activity

Marketer who directs shipment
off-specification used oil to
off-specification used oil burner:

Unknown

TSD Activity: No

Recycler Activity: Unknown

Processor: Unknown
Refiner: Unknown

Marketer who first claims the used
oil meets the specifications:

Unknown

Exempt Boiler and/or Industrial Furnace

Small Quantity Onsite Burner Exemption: Unknown
Smelting, melting, Refining Furnace
Exemption: Unknown

Underground
Injection Control: Unknown

Destination Facility for
Universal Waste:

Unknown

Biennial Report Information

Total Quantity Reported (Tons): Generated: 598 Managed: 273 Shipped: 325 Received: 0

Top 10 GM Forms Summary by Largest Quantity of Hazardous Waste Generated (All quantities are in tons)

Generated	Managed	Onsite Management Methods	Shipped	Offsite Management Methods
-----------	---------	---------------------------	---------	----------------------------

WASTE WATER TREATMENT SLUDGE

228

0

228

EPA Waste Codes: F006

SPENT ACID FROM STRIPPING OPERATION

96

0

96

EPA Waste Codes: D002

Activity Location:	MI	Source Type:	Implementer	Seq. Number:	2	Receive Date:	25 AUG 1998
--------------------	----	--------------	-------------	--------------	---	---------------	-------------

Other/Previous Site Name: APOLLO PLATING INC

Location: 15765 STURGEON
Address: ROSEVILLE, MI 48066

Mailing Address: 15765 STURGEON
ROSEVILLE, MI 48066

Contact Person: ARGYRI IOANNOU 15765 STURGEON
For Source Information: (586) 777-0070 ROSEVILLE, MI 48066

RCRA Site Detail

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MID052035425 APOLLO PLATING INC

ued...

Owner (current)

JIM GRIMES SR

From: 08/06/1998 To:

Type: Private

Phone:

Operator (current)

JAMES E GRIMES

From: 03/27/1989 To:

Type: Private

Phone:

Owner (previous)

CHARLES E PEDROTTE

From: 08/04/1998 To: 08/05/1998

Type: Private

Phone:

Land Type: Private

Non Notifier: No

Commercial Availability: Unknown

Tsd Date:

Accessibility:

No. Employees:

State District:

RCRA Site Detail

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MID052035425 APOLLO PLATING INC

ued...

Hazardous Waste Activities

Hazardous Waste Generator Status - Federal: Large Quantity Generator; State: MI-1 Large Quantity Generator - Generates gt 1,000 kg of hazardous waste in

Transfer Facility: No

Used Oil Activities

Other Hazardous Waste Generator Activities

Used Oil Transporter Activity

Off-Specification Used Oil Burner:

No

Importer Activity: No

Transporter: No

Used Oil Fuel Marketer Activity

Mixed Waste Generator: No

Transfer Facility: No

Marketer who directs shipment

Transporter Activity: No

Used Oil Processor and/or

off-specification used oil to

TSD Activity: No

Re-refiner Activity

off-specification used oil burner:

No

Recycler Activity: No

Processor: No

Marketer who first claims the used

Exempt Boiler and/or Industrial Furnace

Refiner: No

oil meets the specifications:

No

Small Quantity Onsite Burner Exemption: No

Underground

Destination Facility for

Smelting, melting, Refining Furnace

Injection Control: No

Universal Waste:

No

Exemption: No

RCRA Site Detail

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rued...

any calendar month during a year or a small quantity generator that has more than 6,000 kg of hazardous waste

RCRA Site Detail

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ued...

accumulated on-site. See regulations for acute waste.

Universal Waste Activities:

Description	Generated	Accumulated
Batteries	N	N
DEVICES CONTAINING ELEMENTAL MERCURY	N	N
Lamps	N	N
MERCURY THERMOMETERS	N	N
Pesticides	N	N
MERCURY SWITCHES	N	N
Thermostats	N	N

Activity Location: MI **Source Type:** Biennial Report **Seq. Number:** 5 **Receive Date:** 13 JAN 1998 **Report Cycle:** 1997

Other/Previous Site Name: APOLLO PLATING INCORPORATED

Location 15765 STURGEON
Address: ROSEVILLE, IL 48066**Mailing** 15765 STURGEON
Address: ROSEVILLE, IL 48066**Contact Person** ARGYRI P IOANNOU
For Source (810) 777-0070
Information**Land Type:** Bad code - U **Non Notifier:** No **Commercial Availability:** Other - U **Tsd Date:**
Accessibility: **No. Employees:** **State District:****NAICS Codes:** 332813 Electroplating, Plating, Polishing, Anodizing, and Coloring**Regulated Waste Activities****Hazardous Waste Generator Status -** Federal: Large Quantity Generator; State:**Transfer Facility:** Unknown**Used Oil Activities****Other Hazardous Waste Generator Activities****Used Oil Transporter Activity** **Off-Specification Used Oil Burner:** Unknown**Importer Activity:** Unknown
Mixed Waste Generator: Unknown**Transporter:** Unknown
Transfer Facility: Unknown**Used Oil Fuel Marketer Activity****Transporter Activity:** Unknown**Used Oil Processor and/or**
Re-refiner Activity**Marketer who directs shipment**
off-specification used oil to
off-specification used oil burner: Unknown**TSD Activity:** No**Recycler Activity:** Unknown**Processor:** Unknown
Refiner: Unknown**Marketer who first claims the used**
oil meets the specifications: Unknown**Exempt Boiler and/or Industrial Furnace****Small Quantity Onsite Burner Exemption:** Unknown
Smelting, melting, Refining Furnace
Exemption: Unknown**Underground**
Injection Control: Unknown **Destination Facility for**
Universal Waste: Unknown**Biennial Report Information****Total Quantity Reported (Tons):** Generated: 246,940 Managed: 246,790 Shipped: 150 Received: 0**Top 10 GM Forms Summary by Largest Quantity of Hazardous Waste Generated (All quantities are in tons)****Generated** **Managed** **Onsite Management Methods** **Shipped** **Offsite Management Methods**

SLUDGE GENERATED FROM PROCESS WASTE WATER FROM THE PRETREATMENT SYSTEM.

150

0

150 H129 - OTHER TREATMENT

EPA Waste Codes: F006**Activity Location:** MI **Source Type:** Biennial Report **Seq. Number:** 4 **Receive Date:** 22 JAN 1996 **Report Cycle:** 1995

Other/Previous Site Name: APOLLO PLATING INCORPORATED

Location 15765 STURGEON
Address: ROSEVILLE, MI 48066**Mailing** 15765 STURGEON
Address: ROSEVILLE, MI 48066**C Person** ARGYRI P IOANNOU
F ce (810) 777-0070
Information**Land Type:** Bad code - U **Non Notifier:** No **Commercial Availability:** Other - U **Tsd Date:**
Accessibility: **No. Employees:** **State District:****NAICS Codes:**

RCRA Site Detail

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ued...

332813 Electroplating, Plating, Polishing, Anodizing, and Coloring

Notes: A "LINE LAY OUT" DIAGRAM WAS ALSO INCLUDED WITH THIS REPORT ON PAGE 7 OF 7.

Regulated Waste Activities

Hazardous Waste Generator Status - Federal: Large Quantity Generator; State:

Transfer Facility: Unknown

Other Hazardous Waste Generator ActivitiesImporter Activity: Unknown
Mixed Waste Generator: Unknown

Transporter Activity: Unknown

TSD Activity: No

Recycler Activity: Unknown

Exempt Boiler and/or Industrial FurnaceSmall Quantity Onsite Burner Exemption: Unknown
Smelting, melting, Refining Furnace Exemption: Unknown**Used Oil Activities**

Used Oil Transporter Activity Off-Specification Used Oil Burner: Unknown

Transporter: Unknown
Transfer Facility: UnknownUsed Oil Processor and/or
Re-refiner ActivityProcessor: Unknown
Refiner: Unknown**Used Oil Fuel Marketer Activity**Marketer who directs shipment
off-specification used oil to
off-specification used oil burner: UnknownMarketer who first claims the used
oil meets the specifications: UnknownUnderground
Injection Control: Unknown Destination Facility for
Universal Waste: Unknown**Biennial Report Information**

Total Quantity Reported (Tons): Generated: 172,039 Managed: 172,006 Shipped: 33 Received: 0

Top 10 GM Forms Summary by Largest Quantity of Hazardous Waste Generated (All quantities are in tons)

Generated Managed Onsite Management Methods Shipped Offsite Management Methods

SLUDGE GENERATED FROM PROCESS WASTE WATER FROM THE PRETREATMENT SYSTEM

33

0

33 H129 - OTHER TREATMENT

EPA Waste Codes: F006

Activity Location: MI Source Type: Biennial Report Seq. Number: 3 Receive Date: 28 FEB 1994 Report Cycle: 1993

Other/Previous Site Name: APOLLO PLATING INCORPORATED

Location 15765 STURGEON
Address: ROSEVILLE, MI 48066Mailing 15765 STURGEON
Address: ROSEVILLE, MI 48066Contact Person DONALD P SCHROCK
For Source (810) 777-0070
Information

Land Type: Bad code - U Non Notifier: No Commercial Availability: Other - U Tsd Date:

Accessibility: No. Employees: State District:

NAICS Codes: 332813 Electroplating, Plating, Polishing, Anodizing, and Coloring

Regulated Waste Activities

Hazardous Waste Generator Status - Federal: Large Quantity Generator; State:

Transfer Facility: Unknown

Other Hazardous Waste Generator ActivitiesImporter Activity: Unknown
Mixed Waste Generator: Unknown

Transporter Activity: Unknown

TSD Activity: No

Recycler Activity: Unknown

Exempt Boiler and/or Industrial FurnaceSmall Quantity Onsite Burner Exemption: Unknown
Smelting, melting, Refining Furnace Exemption: Unknown**Used Oil Activities**

Used Oil Transporter Activity Off-Specification Used Oil Burner: Unknown

Transporter: Unknown
Transfer Facility: UnknownUsed Oil Processor and/or
Re-refiner ActivityProcessor: Unknown
Refiner: Unknown**Used Oil Fuel Marketer Activity**Marketer who directs shipment
off-specification used oil to
off-specification used oil burner: UnknownMarketer who first claims the used
oil meets the specifications: UnknownUnderground
Injection Control: Unknown Destination Facility for
Universal Waste: Unknown**Biennial Report Information**

Total Quantity Reported (Tons): Generated: 172,039 Managed: 172,006 Shipped: 33 Received: 0

RCRA Site Detail

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Top 10 GM Forms Summary - continued (All quantities are in tons)

Generated	Managed	Onsite Management Methods	Shipped	Offsite Management Methods
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Top 10 GM Forms Summary by Largest Quantity of Hazardous Waste Generated (All quantities are in tons)

Generated	Managed	Onsite Management Methods	Shipped	Offsite Management Methods
-----------	---------	---------------------------	---------	----------------------------

SLUDGE FROM WASTEWATER TREATMENT OF AN ELECTROPLATING OPERATION

33

0

33 H129 - OTHER TREATMENT

EPA Waste Codes: F006

Activity Location: MI	Source Type: Biennial Report	Seq. Number: 2	Receive Date: 08 FEB 1992	Report Cycle: 1991
-----------------------	------------------------------	----------------	---------------------------	--------------------

Other/Previous Site Name: APOLLO PLATING INC

Location	15765 STURGEON
Address:	ROSEVILLE, MI 48066

Mailing	15765 STURGEON
Address:	ROSEVILLE, MI 48066

Contact Person	GEORGE G SALEH
For Source Information	(313) 777-0070

Land Type: Bad code - U	Non Notifier: No	Commercial Availability: Other - U	Tsd Date:
Accessibility:	No. Employees:	State District:	

NAICS Codes: 332813 Electroplating, Plating, Polishing, Anodizing, and Coloring

Notes: SECTION VIII, BOXES D.J. & E.L.O: BOXES WERE LEFT BLANK, THEREFORE DAC AT DPRA ENTERED "NO" FOR EACH PER CONVERSATION WITH GEORGE SALEH, Q.C. MANAGER, APOLLO PLATING INC., OCTOBER1, 1992.

Regulated Waste Activities

Hazardous Waste Generator Status - Federal: Large Quantity Generator; State:

Transfer Facility: Unknown

Used Oil Activities**Other Hazardous Waste Generator Activities**

Used Oil Transporter Activity Off-Specification Used Oil Burner: Unknown

Importer Activity:	Unknown
Mixed Waste Generator:	Unknown

Transporter:	Unknown
Transfer Facility:	Unknown

Used Oil Fuel Marketer Activity

Transporter Activity: Unknown

Used Oil Processor and/or Re-refiner Activity

Marketer who directs shipment off-specification used oil to off-specification used oil burner: Unknown

TSD Activity: No

Recycler Activity: Unknown

Processor:	Unknown
Refiner:	Unknown

Marketer who first claims the used oil meets the specifications: Unknown

Exempt Boiler and/or Industrial Furnace

Small Quantity Onsite Burner Exemption:	Unknown
Smelting, melting, Refining Furnace Exemption:	Unknown

Underground Injection Control:	Unknown	Destination Facility for Universal Waste:	Unknown
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Biennial Report Information

Total Quantity Reported (Tons): Generated: 96,034 Managed: 96,003 Shipped: 31 Received: 0

Top 10 GM Forms Summary by Largest Quantity of Hazardous Waste Generated (All quantities are in tons)

Generated	Managed	Onsite Management Methods	Shipped	Offsite Management Methods
-----------	---------	---------------------------	---------	----------------------------

SLUDGE FROM WASTEWATER TREATMENT OF AN ELECTROPLATING OPERATION.

31

0

31 H132 - LANDFILL OR SURFACE IMPOUNDMENT

EPA Waste Codes: F006

Activity Location: MI	Source Type: Biennial Report	Seq. Number: 1	Receive Date: 23 FEB 1990	Report Cycle: 1989
-----------------------	------------------------------	----------------	---------------------------	--------------------

Other/Previous Site Name: APOLLO PLATING INC

n	15765 STURGEON
s:	ROSEVILLE, MI 48066

Mailing	15765 STURGEON
Address:	ROSEVILLE, MI 48066

Contact Person	GEORGE G SALEH
For Source Information	(313) 777-0070

RCRA Site Detail

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ued...

Land Type: Bad code - U Non Notifier: No Commercial Availability: Other - U Tsd Date:
Accessibility: No. Employees: State District:

NAICS Codes: 332813 Electroplating, Plating, Polishing, Anodizing, and Coloring

Regulated Waste Activities

Hazardous Waste Generator Status - Federal: Large Quantity Generator; State:

Transfer Facility: Unknown

Used Oil Activities

Other Hazardous Waste Generator Activities

Used Oil Transporter Activity

Off-Specification Used Oil Burner:

Unknown

Importer Activity: Unknown
Mixed Waste Generator: Unknown

Transporter: Unknown
Transfer Facility: Unknown

Used Oil Fuel Marketer Activity

Transporter Activity: Unknown

Used Oil Processor and/or
Re-refiner Activity

Marketer who directs shipment
off-specification used oil to
off-specification used oil burner:

Unknown

TSD Activity: No

Recycler Activity: Unknown

Processor: Unknown
Refiner: Unknown

Marketer who first claims the used
oil meets the specifications:

Unknown

Exempt Boiler and/or Industrial Furnace

Small Quantity Onsite Burner Exemption: Unknown
Smelting, melting, Refining Furnace
Exemption: Unknown

Underground
Injection Control: Unknown

Destination Facility for
Universal Waste:

Unknown

Biennial Report Information

Total Quantity Reported (Tons): Generated: 89,592 Managed: 89,575 Shipped: 18 Received: 0

Top 10 GM Forms Summary by Largest Quantity of Hazardous Waste Generated (All quantities are in tons)

Generated	Managed	Onsite Management Methods	Shipped	Offsite Management Methods
-----------	---------	---------------------------	---------	----------------------------

WASTEWATER TREATMENT FROM ELECTROPLATING OPERATION

18

0

18 H132 - LANDFILL OR SURFACE
IMPOUNDMENT

EPA Waste Codes: F006

Activity Location:	MI	Source Type:	Notification	Seq. Number:	1	Receive Date:	29 JAN 1981
--------------------	----	--------------	--------------	--------------	---	---------------	-------------

Other/Previous Site Name: APOLLO PLATING INC

Location: 15765 STURGEON
Address: ROSEVILLE, MI 48066

Mailing Address: 15765 STURGEON
ROSEVILLE, MI 48066

Contact Person: ARGYRI IOANNOU
For Source Information: (586) 777-0070
15765 STURGEON
ROSEVILLE, MI 48066

Owner (current)

JIM GRIMES SR
From: 08/06/1998 To:

Type: Private

Phone:

Operator (current)

JAMES E GRIMES
From: 03/27/1989 To:

Type: Private

Phone:

Owner (previous)

CHARLES E PEDROTTE
From: 08/04/1998 To: 08/05/1998

Type: Private

Phone:

Land Type: Private Non Notifier: No Commercial Availability: Unknown Tsd Date:
Accessibility: No. Employees: State District:

RCRA Site Detail

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ated Waste Activities

Hazardous Waste Generator Status - Federal: Large Quantity Generator; State: MI-1 Large Quantity Generator - Generates gt 1,000 kg of hazardous waste in

Transfer Facility: No

Used Oil Activities

Other Hazardous Waste Generator Activities

Used Oil Transporter Activity

Off-Specification Used Oil Burner:

No

Importer Activity: No

Transporter: No

Mixed Waste Generator: No

Transfer Facility: No

Used Oil Fuel Marketer Activity

Transporter Activity: No

Used Oil Processor and/or

Marketer who directs shipment

TSD Activity: No

Re-refiner Activity

off-specification used oil to

Recycler Activity: No

Processor: No

off-specification used oil burner:

No

Refiner: No

Marketer who first claims the used

oil meets the specifications:

No

Exempt Boiler and/or Industrial Furnace

Small Quantity Onsite Burner Exemption: No

Underground

Destination Facility for

Smelting, melting, Refining Furnace

Injection Control: No

Universal Waste:

Exemption: No

No

RCRA Site Detail

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ued...

any calendar month during a year or a small quantity generator that has more than 6,000 kg of hazardous waste

RCRA Site Detail

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MID052035425 APOLLO PLATING INC

rued...

accumulated on-site. See regulations for acute waste.

Universal Waste Activities:

Description	Generated	Accumulated
Batteries	N	N
DEVICES CONTAINING ELEMENTAL MERCURY	N	N
Lamps	N	N
MERCURY THERMOMETERS	N	N
Pesticides	N	N
MERCURY SWITCHES	N	N
Thermostats	N	N

* End of Report *

Michigan Department of Environmental Quality



Waste and Hazardous Materials Division
38980 Seven Mile Road
Livonia, Michigan 48152-1006

Fax Cover Sheet

DATE: 3/22/04

TIME: 2:00 PM EST

TO: BRIAN GIANWISER PHONE:
FAX: 312 353-4342
REGION 5 WTPD

FROM: MDEQ, WHMD PHONE:
MARK DANIELS FAX: 734-432-1277

RE: APOLLO

Number of pages including cover sheet: 6

Message

BRIAN

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Department of Environmental Quality

Manifest Detail Inquiry

.....Starting Manifest Date=3/1/2001.....Ending Manifest Date=3/1/2004.....Generator like mid052035425*

APOLLO PLATING ROSEVILLE MICH.

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Manifest No	Generator ID	TSD ID	Current / Original Micro	Trans 1/2	Date	Lot	Waste Number	Total Quantity	Unit M	Equivalent Tons
EN - MI7200070	MID052035425	MID074259565	16121579 / 16121579	MIR000017079	3/23/2001	001	D002	950	Gallons	4
ID - MI7200070	MID052035425	MID074259565	16131438 / 16131438	None	3/23/2001	001	D002	950	Gallons	4
EN - MI7200074	MID052035425	MID096963194	16181245 / 16181245	MIR000017079	4/20/2001	001	D002	275	Gallons	1
ID - MI7200074	MID052035425	MID096963194	EWaste / EWaste	MIR000017079	4/20/2001	001	D002	275	Gallons	1
EN - MI7439265	MID052035425	MID074259565	16331618 / 16331618	MIR000019554	6/22/2001	001	D002	850	Gallons	3
ID - MI7439265	MID052035425	MID074259565	16381848 / 16381848	None	6/22/2001	001	D002	850	Gallons	3
EN - MI7984177	MID052035425	MID074259565	16742277 / 16742277	MIR000019554	12/4/2001	001	D002	950	Gallons	4
ID - MI7984177	MID052035425	MID074259565	16732742 / 16732742		12/4/2001	001	D002	950	Gallons	4
EN - MI7984178	MID052035425	MID074259565	17601479 / 17601479	MIR000019554	11/12/2002	001	D002	850	Gallons	3
ID - MI7984178	MID052035425	MID074259565	17602713 / 17602713		11/12/2002	001	D002	850	Gallons	3
EN - MI8037014	MID052035425	MID074259565	16250766 / 16250766	MIR000019554	5/17/2001	001	D002	800	Gallons	3
ID - MI8037014	MID052035425	MID074259565	16270800 / 16270800	None	5/17/2001	001	D002	800	Gallons	3
EN - MI8037016	MID052035425	MID074259565	16430022 / 16430022	MIR000019554	8/6/2001	001	D002	950	Gallons	4
ID - MI8037016	MID052035425	MID074259565	16441630 / 16441630	None	8/6/2001	001	D002	950	Gallons	4
EN - MI8037017	MID052035425	MID074259565	16620015 / 16620015	MIR000019554	10/25/2001	001	D002	970	Gallons	4
ID - MI8037017	MID052035425	MID074259565	16661923 / 16661923		10/25/2001	001	D002	970	Gallons	4
EN - MI8037018	MID052035425	MID074259565	17470515 / 17470515	MIR000019554	9/30/2002	001	D002	800	Gallons	3
ID - MI8037018	MID052035425	MID074259565	17481996 / 17481996		9/30/2002	001	D002	800	Gallons	3
EN - MI8100472	MID052035425	MID980991566	16730115 / 16730115	MIR000017079	12/5/2001	001	D002	5,173	Gallons	21
ID - MI8100472	MID052035425	MID980991566	16810585 / 16810585		12/5/2001	001	D002	5,173	Gallons	21
EN - MI8119594	MID052035425	MID074259565	16111266 / 16111266	MIR000019554	3/20/2001	001	D002	800	Gallons	3
ID - MI8119594	MID052035425	MID074259565	16120271 / 16120271	None	3/20/2001	001	D002	800	Gallons	3
EN - MI8119829	MID052035425	MID074259565	16481906 / 16481906	MIR000019554	9/6/2001	001	D002	813	Gallons	3
ID - MI8119829	MID052035425	MID074259565	16512257 / 16512257		9/6/2001	001	D002	813	Gallons	3
EN - MI8229504	MID052035425	MID096963194	16790391 / 16790391	MIR000017079	12/19/2001	001	D002	275	Gallons	1
ID - MI8229504	MID052035425	MID096963194	EWaste / EWaste	MIR000017079	12/19/2001	001	D002	275	Gallons	1
EN - MI8229519	MID052035425	MID074259565	16860683 / 16860683	MIR000017079	1/24/2002	001	D002	1,275	Gallons	5
ID - MI8229519	MID052035425	MID074259565	16852480 / 16852480		1/24/2002	001	D002	1,275	Gallons	5
EN - MI8229546	MID052035425	MID074259565	17172518 / 17172518	MIR000017079	5/21/2002	001	D002	1,640	Gallons	7
ID - MI8229546	MID052035425	MID074259565	17180436 / 17180436		5/21/2002	001	D002	1,640	Gallons	7

Manifest No	Generator ID	TSD ID	Current Micro / Original Micro	Trans 1 / 2	Date	Lot	Waste Number	Total Quantity	U of M	Equivalent Tons
EN - MI822960	MID052035425	MID096963194	17192775 / 17192775	MIR000017079	5/30/2002	001	D002	275	Gallons	1
	MID052035425	MID096963194	17192775 / 17192775	MIR000017079	5/30/2002	002	D002	55	Gallons	0
	MID052035425	MID096963194	17192775 / 17192775	MIR000017079	5/30/2002	003	D002	55	Gallons	0
	MID052035425	MID096963194	17192775 / 17192775	MIR000017079	5/30/2002	004	D001	35	Gallons	0
ID - MI8229601	MID052035425	MID096963194	17210143 / 17210143		5/30/2002	001	D002	275	Gallons	1
	MID052035425	MID096963194	17210143 / 17210143		5/30/2002	002	D002	55	Gallons	0
	MID052035425	MID096963194	17210143 / 17210143		5/30/2002	003	D002	55	Gallons	0
	MID052035425	MID096963194	17210143 / 17210143		5/30/2002	004	D001	35	Gallons	0
EN - MI8229611	MID052035425	MID980991566	17241587 / 17241587	MIR000017079	6/14/2002	001	D007	965	Gallons	4
ID - MI8229611	MID052035425	MID980991566	17261850 / 17261850		6/14/2002	001	D007	965	Gallons	4
EN - MI8229705	MID052035425	MID074259565	17480883 / 17480883	MIR000017079	10/3/2002	001	D002	919	Gallons	4
ID - MI8229705	MID052035425	MID074259565	17502456 / 17502456		10/3/2002	001	D002	919	Gallons	4
EN - MI8229790	MID052035425	MID074259565	18070580 / 18070580	MIR000017079	7/2/2003	001	D002	3,097	Gallons	12
ID - MI8229790	MID052035425	MID074259565	18090938 / 18090938		7/2/2003	001	D002	3,097	Gallons	12
EN - MI8229791	MID052035425	MID074259565	17731922 / 17731922	MIR000017079	1/24/2003	001	D002	1,345	Gallons	5
ID - MI8229791	MID052035425	MID074259565	17721442 / 17721442		1/24/2003	001	D002	1,345	Gallons	5
EN - MI8229793	MID052035425	MID096963194	17760611 / 17760611	MIR000017079	2/7/2003	001	D002	110	Gallons	0
ID - MI8229793	MID052035425	MID096963194	17800217 / 17800217		2/7/2003	001	D002	110	Gallons	0
EN - MI8275665	MID052035425	MID074259565	17192776 / 17192776	MIR000019554	5/30/2002	001	D002	900	Gallons	4
ID - MI8275665	MID052035425	MID074259565	17212374 / 17212374		5/30/2002	001	D002	900	Gallons	4
EN - MI8275804	MID052035425	MID074259565	17292441 / 17292441	MIR000019554	7/8/2002	001	D002	500	Gallons	2
ID - MI8275804	MID052035425	MID074259565	17302612 / 17302612		7/8/2002	001	D002	500	Gallons	2
EN - MI8275907	MID052035425	MID074259565	17370824 / 17370824	MIR000019554	8/8/2002	001	D002	813	Gallons	3
ID - MI8275907	MID052035425	MID074259565	17380842 / 17380842		8/8/2002	001	D002	813	Gallons	3
EN - MI8281698	MID052035425	MID074259565	16841565 / 16841565	MIR000019554	1/17/2002	001	D002	800	Gallons	3
ID - MI8281698	MID052035425	MID074259565	16850190 / 16850190		1/17/2002	001	D002	800	Gallons	3
EN - MI8281769	MID052035425	MID074259565	16911433 / 16911433	MIR000019554	2/13/2002	001	D002	813	Gallons	3
ID - MI8281769	MID052035425	MID074259565	16912355 / 16912355		2/13/2002	001	D002	813	Gallons	3
EN - MI8281848	MID052035425	MID074259565	16990607 / 16990607	MIR000019554	3/7/2002	001	D002	900	Gallons	4
ID - MI8281848	MID052035425	MID074259565	17002554 / 17002554		3/7/2002	001	D002	900	Gallons	4
EN - MI8281993	MID052035425	MID074259565	17092233 / 17092233	MIR000019554	4/19/2002	001	D002	850	Gallons	3
ID - MI8281993	MID052035425	MID074259565	17102065 / 17102065		4/19/2002	001	D002	850	Gallons	3
EN - MI8336043	MID052035425	MID074259565	16411378 / 16411378	MIT270019904	7/27/2001	001	F006	20	Cubic Yards	20
ID - MI8336043	MID052035425	MID074259565	16431618 / 16431618	None	7/27/2001	001	F006	20	Cubic Yards	20
EN - MI8336044	MID052035425	MID074259565	16791379 / 16791379	MIT270019904	12/20/2001	001	F006	20	Cubic Yards	20

Project ID	Generator ID	TSD ID	Material Name	Trans 1 / 2	Date	Lot	Waste Number	Quantity	Unit	Weight
SD - MI833604	MID052035425	MID074259565	16780703 / 16780703		12/20/2001	001	F006	20	Cubic Yards	20
EN - MI8336045	MID052035425	MID074259565	16990606 / 16990606	MIT270019904	3/7/2002	001	F006	20	Cubic Yards	20
SD - MI8336045	MID052035425	MID074259565	17002551 / 17002551		3/7/2002	001	F006	20	Cubic Yards	20
EN - MI8336046	MID052035425	MID074259565	17071417 / 17071417	MIT270019904	4/11/2002	001	F006	20	Cubic Yards	20
SD - MI8336046	MID052035425	MID074259565	17080241 / 17080241		4/11/2002	001	F006	20	Cubic Yards	20
EN - MI8336061	MID052035425	MID074259565	16151919 / 16151919	MIT270019904	4/5/2001	001	F006	20	Cubic Yards	20
SD - MI8336061	MID052035425	MID074259565	16142047 / 16142047	None	4/5/2001	001	F006	20	Cubic Yards	20
EN - MI8336062	MID052035425	MID074259565	16232390 / 16232390	MIT270019904	5/8/2001	001	F006	20	Cubic Yards	20
SD - MI8336062	MID052035425	MID074259565	16242037 / 16242037	None	5/8/2001	001	F006	20	Cubic Yards	20
EN - MI8336063	MID052035425	MID074259565	16311659 / 16311659	MIT270019904	6/7/2001	001	F006	20	Cubic Yards	20
SD - MI8336063	MID052035425	MID074259565	16321888 / 16321888	None	6/8/2001	001	F006	20	Cubic Yards	20
EN - MI8336064	MID052035425	MID074259565	16500343 / 16500343	MIT270019904	9/4/2001	001	F006	20	Cubic Yards	20
SD - MI8336064	MID052035425	MID074259565	16540534 / 16540534		9/4/2001	001	F006	20	Cubic Yards	20
EN - MI8336065	MID052035425	MID074259565	16601536 / 16601536	MIT270019904	10/15/2001	001	F006	20	Cubic Yards	20
SD - MI8336065	MID052035425	MID074259565	16632275 / 16632275		10/15/2001	001	F006	20	Cubic Yards	20
EN - MI8763920	MID052035425	MID074259565	17651681 / 17651681	MIR000019554	12/17/2002	001	D002	800	Gallons	3
SD - MI8763920	MID052035425	MID074259565	17700987 / 17700987		12/17/2002	001	D002	800	Gallons	3
EN - MI8763985	MID052035425	MID074259565	17730227 / 17730227	MIR000019554	1/20/2003	001	D002	700	Gallons	3
SD - MI8763985	MID052035425	MID074259565	17721439 / 17721439		1/20/2003	001	D002	700	Gallons	3
EN - MI8764607	MID052035425	MID074259565	17781678 / 17781678	MIR000019554	2/20/2003	001	D002	800	Gallons	3
SD - MI8764607	MID052035425	MID074259565	17800642 / 17800642		2/20/2003	001	D002	800	Gallons	3
EN - MI8764688	MID052035425	MID074259565	17960558 / 17960558	MIR000019554	3/24/2003	001	D002	908	Gallons	4
SD - MI8764688	MID052035425	MID074259565	18261850 / 18261850		3/24/2003	001	D002	908	Gallons	4
EN - MI8764917	MID052035425	MID074259565	17920819 / 17920819	MIR000019554	4/29/2003	001	D002	1,011	Gallons	4
SD - MI8764917	MID052035425	MID074259565	17942442 / 17942442		4/29/2003	001	D002	1,011	Gallons	4
EN - MI8884052	MID052035425	MID060975844	18120688 / 18120688	MIR000017079	7/25/2003	001	F006	210	Gallons	1
	MID052035425	MID060975844	18120688 / 18120688	MIR000017079	7/25/2003	002	F006	36	Gallons	0
SD - MI8884052	MID052035425	MID000724831	18121748 / 18121748		7/25/2003	001	F006	168	Gallons	1
	MID052035425	MID000724831	18121748 / 18121748		7/25/2003	002	F006	36	Gallons	0
EN - MI8884257	MID052035425	MID980991566	17990998 / 17990998	MIR000017079	5/29/2003	001	D007	919	Gallons	4
SD - MI8884257	MID052035425	MID980991566	18012411 / 18012411		5/29/2003	001	D007	919	Gallons	4
EN - MI8884379	MID052035425	MID096963194	17910487 / 17910487	MIR000017079	4/24/2003	001	D002	220	Gallons	1
SD - MI8884379	MID052035425	MID096963194	17950641 / 17950641		4/24/2003	001	D002	220	Gallons	1
EN - MI8907345	MID052035425	MID000724831	16922718 / 16922718	MI0000131292	2/21/2002	001	F006	2,268	Pounds	1
SD - MI8907345	MID052035425	MID000724831	17031752 / 17031752		2/27/2002	001	F006	2,268	Pounds	1

Manifest No	Generator ID	TSD ID	Original Micro	Trans 112	Date	Lot	Number	Quantity	U of M	Equivalent Tons
GEN - MI89744	MID052035425	MID000724831	17531647 / 17531647	MI0000131292	10/25/2002	001	F006	5,000	Pounds	3
TSD - MI89744	MID052035425	MID000724831	17561396 / 17561396		11/5/2002	001	F006	6,980	Pounds	3
GEN - MI9067606	MID052035425	MID074259565	17991221 / 17991221	MIR000019554	6/4/2003	001	D002	1,050	Gallons	4
TSD - MI9067606	MID052035425	MID074259565	18030580 / 18030580		6/4/2003	001	D002	1,050	Gallons	4
GEN - MI9067677	MID052035425	MID074259565	18051897 / 18051897	MIR000019554	6/26/2003	001	D002	777	Gallons	3
TSD - MI9067677	MID052035425	MID074259565	18060202 / 18060202		6/26/2003	001	D002	777	Gallons	3
GEN - MI9067744	MID052035425	MID074259565	18110472 / 18110472	MIR000019554	7/23/2003	001	D002	825	Gallons	3
TSD - MI9067744	MID052035425	MID074259565	18140683 / 18140683		7/23/2003	001	D002	825	Gallons	3
GEN - MI9245091	MID052035425	MID000724831	18360342 / 18360342	MI0000131292	3/26/2003	001	F006	2,000	Pounds	1
TSD - MI9245091	MID052035425	MID000724831	17890705 / 17890705		4/7/2003	001	F006	2,000	Pounds	1
GEN - MI9364530	MID052035425	MID074259565	18260953 / 18260953	MIR000019554	9/24/2003	001	D002	515	Gallons	2
TSD - MI9364530	MID052035425	MID074259565	18281628 / 18281628		9/24/2003	001	D002	515	Gallons	2
GEN - MI9364847	MID052035425	MID074259565	18321233 / 18321233	MIR000019554	10/24/2003	001	D002	813	Gallons	3
TSD - MI9364847	MID052035425	MID074259565	18372161 / 18372161		10/24/2003	001	D002	813	Gallons	3
GEN - MI9365357	MID052035425	MID074259565	18201932 / 18201932	MIR000019554	8/28/2003	001	D002	800	Gallons	3
TSD - MI9365357	MID052035425	MID074259565	18211107 / 18211107		8/28/2003	001	D002	800	Gallons	3
GEN - MI9436515	MID052035425	MID074259565	18400269 / 18400269	MIR000019554	11/14/2003	001	D002	800	Gallons	3
TSD - MI9436515	MID052035425	MID074259565	18431397 / 18431397		11/14/2003	001	D002	800	Gallons	3
GEN - MI9436632	MID052035425	MID074259565	18451241 / 18451241	MIR000019554	12/8/2003	001	D002	900	Gallons	4
TSD - MI9436632	MID052035425	MID074259565	18482616 / 18482616		12/8/2003	001	D002	900	Gallons	4
GEN - MI9436804	MID052035425	MID074259565	18520955 / 18520955	MIR000019554	1/6/2004	001	D002	721	Gallons	3
TSD - MI9436804	MID052035425	MID074259565	18532256 / 18532256		1/6/2004	001	D002	721	Gallons	3
GEN - MI9436957	MID052035425	MID074259565	18542268 / 18542268	MIR000019554	1/26/2004	001	D002	633	Gallons	3
TSD - MI9436957	MID052035425	MID074259565	18562615 / 18562615		1/26/2004	001	D002	633	Gallons	3
GEN - PAG335844	MID052035425	PAD981038227	18360338 / 18360338	NJD054126164	5/13/2002	001	F006	20	Cubic Yards	20
TSD - PAG335844	MID052035425	PAD981038227	17811744 / 17180844		5/20/2003	001	F006	20	Cubic Yards	20
GEN - PAG335845	MID052035425	PAD981038227	17010895 / 17010895	NJD054126164	11/16/2001	001	F006	20	Cubic Yards	20
TSD - PAG335845	MID052035425	PAD981038227	16712408 / 16712408		11/20/2001	001	F006	20	Cubic Yards	20
TSD - PAG349515	MID052035425	PAD981038227	17810645 / 17382593		8/12/2002	001	F006	20	Cubic Yards	20
TSD - PAG349516	MID052035425	PAD981038227	17810644 / 17412006		9/5/2002	001	F006	20	Cubic Yards	20
GEN - PAG349517	MID052035425	PAD981038227	18360337 / 18360337	NJD054126164	10/4/2002	001	F006	20	Cubic Yards	20
TSD - PAG349517	MID052035425	PAD981038227	17511746 / 17511746		10/8/2002	001	F006	20	Cubic Yards	20
GEN - PAG349518	MID052035425	PAD981038227	18360336 / 18360336	NJD054126164	10/28/2002	001	F006	20	Cubic Yards	20
TSD - PAG349518	MID052035425	PAD981038227	17551052 / 17551052		10/29/2002	001	F006	20	Cubic Yards	20
GEN - PAG349519	MID052035425	PAD981038227	18360335 / 18360335	NJD054126164	11/21/2002	001	F006	20	Cubic Yards	20

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Project ID	Generator ID	TSF ID	Owner Name	Issue 1/2	Issue	Lot	Volume	Material	Quantity
SD - PAG3495	MID052035425	PAD981038227	17620124 / 17620124		11/27/2002	001	F006	20	Cubic Yards 20
SD - PAG349520	MID052035425	PAD981038227	17811745 / 16891347		2/4/2002	001	F006	20	Cubic Yards 20
SD - PAG357075	MID052035425	PAD981038227	17811747 / 17282760		1/7/2002	001	F006	20	Cubic Yards 20
SD - PAG357076	MID052035425	PAD981038227	17811746 / 17231904		6/10/2002	001	F006	20	Cubic Yards 20
EN - PAG422631	MID052035425	PAD981038227	18360341 / 18360341	NJD054126164	12/20/2002	001	F006	20	Cubic Yards 20
SD - PAG422631	MID052035425	PAD981038227	17681573 / 17681573		12/26/2002	001	F006	20	Cubic Yards 20
EN - PAG422632	MID052035425	PAD981038227	18360340 / 18360340	NJD054126164	1/30/2003	001	F006	20	Cubic Yards 20
SD - PAG422632	MID052035425	PAD981038227	17750604 / 17750604		2/4/2003	001	F006	20	Cubic Yards 20
EN - PAG422633	MID052035425	PAD981038227	18360339 / 18360339	NJD054126164	3/10/2003	001	F006	20	Cubic Yards 20
SD - PAG422633	MID052035425	PAD981038227	17830989 / 17830989		3/12/2003	001	F006	20	Cubic Yards 20
EN - PAG422634	MID052035425	PAD981038227	17881290 / 17881290	NJD054126164	4/10/2003	001	F006	20	Cubic Yards 20
SD - PAG422634	MID052035425	PAD981038227	17902737 / 17902737		4/15/2003	001	F006	20	Cubic Yards 20
EN - PAG475550	MID052035425	PAD981038227	17941581 / 17941581	NJD054126164	5/7/2003	001	F006	20	Cubic Yards 20
SD - PAG475550	MID052035425	PAD981038227	17961654 / 17961654		5/12/2003	001	F006	20	Cubic Yards 20
EN - PAG475551	MID052035425	PAD981038227	18031360 / 18031360	NJD054126164	6/12/2003	001	F006	20	Cubic Yards 20
SD - PAG475551	MID052035425	PAD981038227	18042614 / 18042614		6/17/2003	001	F006	20	Cubic Yards 20
EN - PAG475552	MID052035425	PAD981038227	18360333 / 18110986	NJD054126164	7/22/2003	001	F006	20	Cubic Yards 20
SD - PAG475552	MID052035425	PAD981038227	18130644 / 18130644		7/23/2003	001	F006	20	Cubic Yards 20
EN - PAG475553	MID052035425	PAD981038227	18360334 / 18270384	NJD054126164	9/29/2003	001	F006	20	Cubic Yards 20
SD - PAG475553	MID052035425	PAD981038227	18280534 / 18280534		10/2/2003	001	F006	20	Cubic Yards 20
EN - PAG475554	MID052035425	PAD981038227	18360332 / 18360332	NJD054126164	10/29/2003	001	F006	20	Cubic Yards 20
SD - PAG475554	MID052035425	PAD981038227	18340912 / 18340912		10/30/2003	001	F006	20	Cubic Yards 20
EN - PAG475555	MID052035425	PAD981038227	18490044 / 18490044	NJD054126164	12/5/2003	001	F006	20	Cubic Yards 20
SD - PAG475555	MID052035425	PAD981038227	18492422 / 18492422		12/10/2003	001	F006	20	Cubic Yards 20
EN - PAG475556	MID052035425	PAD981038227	18551839 / 18551839	NJD054126164	1/16/2004	001	F006	20	Cubic Yards 20
SD - PAG475556	MID052035425	PAD981038227	18560930 / 18560930		1/19/2004	001	F006	20	Cubic Yards 20
EN - PAG475557	MID052035425	PAD981038227	18592224 / 18592224	NJD054126164	2/13/2004	001	F006	20	Cubic Yards 20
EN - PAH021187	MID052035425	PAD981038227	18360331 / 18191400	NJD054126164	8/22/2003	001	F006	20	Cubic Yards 20
SD - PAH021187	MID052035425	PAD981038227	18200791 / 18200791		8/23/2003	001	F006	20	Cubic Yards 20

RECEIVED

SEP 8 1982

RCRA Inspection Report

RECEIVED

#156

AUG 27 1982

ACT 64

EPA Identification Number: M I D 0 5 2 0 3 5 4 2 5

Installation Name: APOLLO PLATING, INC.

Location Address: 15765 STURGEON

City: ROSEVILLE

State: MICHIGAN

Date of inspection: 8/23/82

Time of inspection (from) 10:40 A.M. (to) 11:00 A.M.

Person(s) interviewed

Title

Telephone

CHARLES PEDROTTI

PRESIDENT

(313) 777-0070

Inspector(s)

Agency/Title

Telephone

ANDREA STEWART

MDNR - AIR QUALITY

(313) 666-2700

Installation Activity (mark only one box)

Inspection Form(s)

☐ Treatment/Storage/Disposal per 40 CFR 265.1 and/or
Generation and/or Transportation

A

☐ Treatment/Storage/Disposal (no generation or Transportation)

A

☐ Generation and Transportation

B, C

☒ Generation only

B

☐ Transportation only

C

INSPECTION FORM B

Section A: Scope of inspection

Standards for generators of HAZARDOUS WASTE subject to 40 CFR 262.10

Section B: MANIFEST REQUIREMENTS (Part 262, Subpart B)

	Yes	No	NI*	Remarks
(1) Does the generator have copies of the manifest available for review? 262.40	✓			
(2) Examine manifests for shipments in past 6 months. Indicate approximate number of manifested shipments during that period. <u>2</u>				
(3) Do the manifest forms examined contain the following information? (If possible, make copies of, or record information from, manifests that do not contain the critical elements) 262.21	✓			
a. Manifest document number?	✓			
b. Name, mailing address, telephone number, and EPA ID number of generator?	✓			
c. Name and EPA ID number of transporter(s)?	✓			
d. Name, Address, and EPA ID Number of designated permitted facility and alternate facility?	✓			
e. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	✓			
f. The total quantity of waste(s) and the type and number of containers loaded?	✓			
g. Required certification?	✓			
h. Required signatures?	✓			
(4) Reportable exceptions 262.42				
a. For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has NOT received a signed copy from the designated facility within 35 days of the date of shipment. <u> </u>				
b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) to the Regional Administrator. <u> </u>				

Section C - PRE-TRANSPORT REQUIREMENTS
(40 CFR Part 262 Subpart C)

	Yes	No	NI	Remarks
(1) Is waste packaged in accordance with DOT regulations? (Required prior to movement of hazardous waste off-site) 262.30	_____	_____	<input checked="" type="checkbox"/>	TRANSPORTER PUMPS OUT PLATING BATH TANK WHEN ACID IS SPENT
(2) Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required prior to movement of hazardous waste off-site) 262.31 and 262.32	_____	_____	<input checked="" type="checkbox"/>	_____
(3) If required, are placards available to transporter? 262.33	_____	_____	<input checked="" type="checkbox"/>	_____

** (4) Pre-shipment Accumulation:

** applies only to GENERATORS that store hazardous waste on-site for 90 days or less without a permit. These items do not apply to generators whose waste is immediately transported off-site.

a. Is hazardous waste accumulated in containers? If no, skip to b. 262.34	_____	<input checked="" type="checkbox"/>	_____	_____
i. Is each container clearly marked with the date on which the period of accumulation began?	_____	_____	_____	_____
ii. Have more than 90 days elapsed since the dates marked?	_____	_____	_____	_____
iii. Is each container labeled or marked clearly with the words "Hazardous Wastes?"	_____	_____	_____	_____
iv. Are containers in good condition?	_____	_____	_____	_____
v. Are containers compatible with waste in them?	_____	_____	_____	_____
vi. Are containers managed to prevent leaks?	_____	_____	_____	_____
vii. Are containers stored closed?	_____	_____	_____	_____
viii. Are containers inspected weekly for leaks and defects?	_____	_____	_____	_____
ix. Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive).	_____	_____	_____	_____

	Yes	No	NI	Remarks
x. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)				
xi. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?				
b. Is hazardous waste accumulated in tanks? If no, skip to c. 265.34 (January 11, 1982 revision)		✓		
i. Is each tank labeled or marked clearly with the words "Hazardous Wastes"? 265.34 (January 1982 revision)				
ii. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank? 265.192				
iii. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?				
iv. Do continuous feed systems have a waste-feed cutoff?				
v. Are waste analyses done before the tanks are used to store a substantially different waste than before? 265.193				
vi. Are required daily and weekly inspections done? 265.194				
vii. Are reactive and ignitable wastes in tanks protected or rendered non-reactive or nonignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or nonignitable, see treatment requirements.) 265.198				
viii. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply.) 265.199				

Yes No NI Remarks

- ix. Has the owner or operator observed the National Fire Protection Association's buffer zone requirements for tanks containing ignitable or reactive wastes?

Tank capacity: _____ gallons

Tank diameter: _____ feet

Distance of tank from property line _____ feet

(see tables 2-1 through 2-6 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)

- c. Is hazardous waste accumulated in other than tanks or containers?

_____ ✓ _____

- d. Personnel training. 262.34 (a) 5

NO FACILITY PERSONNEL HANDLE
THE WASTE - TRANSPORTER PUMPS
OUT WASTE ACID.

Do personnel training records include: 265.16

- i. Job Titles? _____ ✓ _____
- ii. Job Descriptions? _____ ✓ _____
- iii. Description of training? _____ ✓ _____
- iv. Records of training? _____ ✓ _____
- v. Did personnel receive the required training by 5-19-81? _____ ✓ _____
- vi. Do new personnel receive required training within six months? _____ ✓ _____
- vii. Do personnel training records indicate that personnel have taken part in an annual review of initial training? _____ ✓ _____

- e. Preparedness and Prevention 265. Subpart C

- i. Maintenance and Operation of Facility:

Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent? 264.31

_____ ✓ _____

ii. If required, does this facility have the following equipment: 264.32

Internal communications or alarm systems? ☒ TANK IS DIKED

Telephone or 2-way Radios at the scene of operations? ☒

Portable fire extinguishers, fire control, spill control equipment and decontamination equipment? ☒

Indicate the volume of water and/or foam available for fire control:

4 FIRE EXTINGUISHERS; WATER LINES

iii. Testing and Maintenance of Emergency Equipment: 264.33

Has the owner or operator established testing and maintenance procedures for emergency equipment? ☒

Is emergency equipment maintained in operable condition? ☒

iv. Has owner/operator provided immediate access to internal alarms (if needed)? ☒ NOT NEEDED

v. Is there adequate aisle space for unobstructed movement? ☒

vi. Has the owner or operator attempted to make arrangements with local authorities in case of an emergency at the facility? ☒

f. Contingency Plan and Emergency Procedures 265 Subpart D

Does the contingency plan contain the following information: SPCC PLAN INSPECTED

i. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.) 265.52 ☒

	Yes	No	NI	Remarks
ii. Arrangements agreed to by local police departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services, pursuant to §265.37?	✓	_____	_____	_____
iii. Names, addresses, and phone numbers (Office and Home) of all persons qualified to act as emergency coordinator.	✓	_____	_____	_____
iv. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list, and a brief outline of its capabilities?	✓	_____	_____	_____
v. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes and alternate evacuation routes?)	_____	_____	✓	_____
vi. Are copies of the Contingency Plan available at site and local emergency organizations?	✓	_____	_____	_____
vii. Is the facility emergency coordinator identified?	✓	_____	_____	<u>C. PEDROTTE</u>
viii. Is coordinator familiar with all aspects of site operation and emergency procedures?	✓	_____	_____	_____
ix. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	✓	_____	_____	_____
x. If an emergency situation has occurred at this facility, has the emergency coordinator followed the emergency procedures listed in 265.56?	_____	_____	✓	<u>NO EMERGENCY SITUATION HAS OCCURRED</u>

Section D: RECORDKEEPING AND REPORTING (Part 262, Subpart D)

Yes No NI Remarks

- (1) Are all test results and analyses needed for hazardous waste determinations retained for at least three years? 262.40

☒ ☐ ☐ ☐

Section E: INTERNATIONAL SHIPMENTS (Part 262 Subpart E)

262.50

- (1) Has the installation imported or exported hazardous waste? If "no", skip a and b.

☐ ☒ ☐ ☐

a. Exporting Hazardous Waste, has a generator:

i. Notified the Administrator in writing?

☐ ☐ ☐ ☐

ii. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?

☐ ☐ ☐ ☐


iii. Met the Manifest requirements?

☐ ☐ ☐ ☐

b. Importing Hazardous Waste, has the generator met the manifest requirements?

☐ ☐ ☐ ☐

Remarks: THIS FACILITY OPERATES A ZINC PLATING PROCESS
FOR AUTO PARTS. THE WASTE GENERATED IS SPENT
HYDROCHLORIC ACID, WHICH IS PUMPED OUT OF A 2,000 -
GALLON TANK AND REPLACED. THE ACID IS CONSIDERED
PART OF THE PLATING PROCESS UNTIL IT IS PUMPED OUT
FOR TRANSPORT; THEREFORE, THERE IS NO PRE-SHIPMENT
ACCUMULATION AND NO FACILITY PERSONNEL WHO HANDLE
THE ACID AS A WASTE. THE ACID BATH TANK IS DIKED.
WASTE ACID SERVICES IS THE TRANSPORTER.

MAIL TO: WHMD, MDEQ, Notification Unit PO BOX 3024 Lansing, MI 48909-7741 OR FAX TO: 517-373-4797	MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY Waste and Hazardous Materials Division <h2 style="margin: 0;">SITE IDENTIFICATION VERIFICATION</h2> <p style="font-size: small;">Required under authority of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. Failure to submit this information may result in civil or criminal penalties.</p>											
<p><u>unless</u> sending \$50 user fee then mail to: MDEQ, Office of Financial Mgmt, Revenue Ctrl Unit, PO BOX 30657 Lansing, MI 48909-8157</p>												
I. The form is being submitted (see instructions on page 6) CHECK CORRECT BOX(ES)	<div style="display: flex; align-items: flex-start;"> <input style="margin-right: 10px;" type="checkbox"/> as initial notification: to notify as a new site or new owner for the site with previously issued site id number (include \$50.00 user charge fee and submit the form and check to: DEQ OFFICE OF FINANCIAL MANAGEMENT) <input style="margin-right: 10px;" type="checkbox"/> as subsequent notification: to change, update, or verify site information for an existing owner of a site with a previously issued site id number (submit to WHMD-MDEQ) <input style="margin-right: 10px;" type="checkbox"/> as a component of a Hazardous Waste Permit Part A (submit to WHMD-MDEQ) <input style="margin-right: 10px;" type="checkbox"/> as a component of the Hazardous Waste Report (biennial report) (submit to WHMD-MDEQ) </div>											
II. Site's ID Number	A. Site's Identification (ID) Number: MID052035425											
III. Name of Site (instructions on page 7) TYPE OR PRINT CLEARLY	A. Legal company name: APOLLO PLATING INC B. Site Specific name (d/b/a): APOLLO PLATING INC											
III. Correct the Name of Site or add missing information below (TYPE OR PRINT CLEARLY)												
A. Legal company name:												
B. Site Specific Name (d/b/a):												
IV. NAICS Code(s) (instructions - page 8)	A. 332813 B. C. D.											
IV. Correct the NAICS Code(s) for the Site or add new code(s) - up to four codes. (TYPE OR PRINT CLEARLY)												
A.	B.	C. D.										
V. Site Location Address and Other Site Information (instructions on page 8) TYPE OR PRINT CLEARLY	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td colspan="2">Street Address: 15765 STURGEON</td> </tr> <tr> <td>City, Town, or Village: ROSEVILLE</td> <td>State: MI</td> </tr> <tr> <td>Province or Subdivision:</td> <td>Country: U.S.A.</td> </tr> <tr> <td>County Name (MI only): MACOMB</td> <td>Zip/Postal Code: 48066</td> </tr> <tr> <td>Site Tax Identification Number: 38XXXXX16</td> <td>Number of Employees: 130</td> </tr> </table>		Street Address: 15765 STURGEON		City, Town, or Village: ROSEVILLE	State: MI	Province or Subdivision:	Country: U.S.A.	County Name (MI only): MACOMB	Zip/Postal Code: 48066	Site Tax Identification Number: 38XXXXX16	Number of Employees: 130
Street Address: 15765 STURGEON												
City, Town, or Village: ROSEVILLE	State: MI											
Province or Subdivision:	Country: U.S.A.											
County Name (MI only): MACOMB	Zip/Postal Code: 48066											
Site Tax Identification Number: 38XXXXX16	Number of Employees: 130											
V. Correct the Site Location Address and Other Site Information or add missing information. (TYPE OR PRINT CLEARLY)												
Street Address:												
City, Town, or Village:	State											
Province or Subdivision:	Country											
County Name (MI only):	Zip Code											
Site Tax ID Number:	Number of Employees											
VI. Site Mailing Address (instructions on page 8) TYPE OR PRINT CLEARLY	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td colspan="2">Mailing Name (if different than Name of Site):</td> </tr> <tr> <td colspan="2">Street or P.O. Box: 15765 STURGEON</td> </tr> <tr> <td colspan="2">City, Town, or Village: ROSEVILLE</td> </tr> <tr> <td>State: MI</td> <td>Province or Subdivision:</td> </tr> <tr> <td>Country: U.S.A.</td> <td>Zip or Postal Code: 48066</td> </tr> </table>		Mailing Name (if different than Name of Site):		Street or P.O. Box: 15765 STURGEON		City, Town, or Village: ROSEVILLE		State: MI	Province or Subdivision:	Country: U.S.A.	Zip or Postal Code: 48066
Mailing Name (if different than Name of Site):												
Street or P.O. Box: 15765 STURGEON												
City, Town, or Village: ROSEVILLE												
State: MI	Province or Subdivision:											
Country: U.S.A.	Zip or Postal Code: 48066											

VI. Correct the Site Mailing Address information or add missing information. (TYPE OR PRINT CLEARLY)

Street Address:			
City, Town, or Village:		State	
Province or Subdivision:		Country	
County Name (MI only):		Zip Code	

VII. Site Contact Person
(instructions on page 9)
TYPE OR PRINT
CLEARLY

First Name: ARGYRI MI: P Last Name: IOANNOU
 Phone Number: (586) 777-0070 Phone Number Extension: 239

VII. Correct the Site Contact Person information or add missing information. (TYPE OR PRINT CLEARLY)

[contact person at the location site]	First Name:	MI:	Last Name:
	Phone Number: ()	Phone Number Extension:	

VIII. Indian Reservation
(instructions on page 9)

Facility on Indian Reservation Land: ☐ yes ☒ no

VIII. Correct the Indian Reservation Status (CLEARLY MARK THE CORRECT BOX)

Facility on Indian Reservation Land: ☐ yes ☐ no

IX. Owner and/or Operator of Site
(instructions on page 9)
TYPE OR PRINT
CLEARLY

1. Name of Site's Legal (check applicable box(es)) Date became owner &/or operator: 8/6/1998
☒ Owner ☐ Operator

Name: JIM GRIMES SR

Type (check one): ☒ Private ☐ County ☐ District ☐ Federal
☐ Indian ☐ Municipal ☐ State ☐ Other

2. Name of Site's Legal (check applicable box(es)) Date became owner &/or operator: 3/27/1989
☒ Owner ☒ Operator

Name: JAMES E GRIMES

Type (check one): ☒ Private ☐ County ☐ District ☐ Federal
☐ Indian ☐ Municipal ☐ State ☐ Other

IX. Correct the Owner and/or Operator information or add missing information. (TYPE OR PRINT CLEARLY)

1. Name of Site's Legal (check applicable box(es)) Date became owner &/or operator:
☐ Owner ☐ Operator Date ceased as owner &/or operator:

Name:

Type (check one): ☐ Private ☐ County ☐ District ☐ Federal
☐ Indian ☐ Municipal ☐ State ☐ Other

2. Name of Site's Legal (check applicable box(es)) Date became owner &/or operator:
☐ Owner ☐ Operator Date ceased as owner &/or operator:

Name:

Type (check one): ☐ Private ☐ County ☐ District ☐ Federal
☐ Indian ☐ Municipal ☐ State ☐ Other

X. Check the appropriate box(es) for the type of regulated waste activity at this Site.

A. Hazardous Waste Activity(ies) at this location

1. Generator of hazardous waste (choose one only of the following three categories)

- ☐ a. LQG: Greater than 1,000 kg/mo (2,200 lbs) of non-acute hazardous waste; or
- ☐ b. SQG: 100 to 1,000 kg/mo (220 - 2,200 lbs) of non-acute hazardous waste; or
- ☐ c. CESQG: Less than 100 kg/mo of non-acute hazardous waste

For items 2 through 8, check all that apply

2. Transporter of hazardous waste

- ☐ a. Transport hazardous waste
- ☐ b. Commingle waste
- ☐ c. Transfer facility

3. Designated facility (hazardous waste received from off-site)

- ☐ a. Treats waste on-site at this location
- ☐ b. Stores waste on-site at this location
- ☐ c. Disposes of waste on-site at this location
- ☐ d. Recycles recyclable materials on-site at this location

☐ 4. Underground injects waste on-site at this location

☐ 5. Import agent for hazardous waste

☐ 6. Generate mixed radioactive waste on-site at this location

☐ 7. Accepts waste from CESQG & accumulates over 1,000 kg on-site at this location

8. Exempt boiler and/or Industrial Furnace on-site at this location

- ☐ a. Smelting, melting, and refining furnace exemption
- ☐ b. Small quantity on-site burner exemption

B. Polychlorinated biphenyls (PCBs)

- ☐ Generated an item, product, or material containing a concentration equal to or greater than 100 ppm of PCB that is not a liquid industrial waste

C. Used Oil Activity(ies) at this location, check all that apply: (used oil generator only check E.2. below a Liquid Industrial Waste Generator)

1. Used Oil Fuel Marketer

- ☐ a. Marketer who directs shipments of off-specification used oil to used oil burner.
- ☐ b. Marketer who first claims the used oil meets the specifications

☐ 2. Off-specification Used Oil Burner

3. Used Oil Transporter

☐ a. Transporter only

or

☐ b. Transporter with transfer facility

☐ 4. Used Oil Processor

☐ 5. Used Oil Re-refiner

☐ 6. Used Oil Collection or Aggregation Point

☐ 7. Collection Center or Aggregation Point that accepts DIY Used Oil

D. Universal Waste Activity(ies) at this location, check all that apply:

1. Large Quantity Handler

Type of Universal Waste	generating	accumulating over 5,000kg
a. Batteries	<input type="checkbox"/>	<input type="checkbox"/>
b. Thermostats	<input type="checkbox"/>	<input type="checkbox"/>
c. Mercury Thermometers	<input type="checkbox"/>	<input type="checkbox"/>
d. Devices containing elemental mercury	<input type="checkbox"/>	<input type="checkbox"/>
e. Mercury Switches	<input type="checkbox"/>	<input type="checkbox"/>
f. Pesticides	<input type="checkbox"/>	<input type="checkbox"/>
g. Electric Lamps	<input type="checkbox"/>	<input type="checkbox"/>

- ☐ 2. Destination Facility of Universal Waste (a hazardous waste permit may be required for this activity)

E. Liquid Industrial Waste Activities at this location check all that apply: (not hazardous waste activity)

- ☐ 1. Liquid Industrial Waste Transporter
- ☐ 2. Liquid Industrial Waste Generator
- ☐ 3. Liquid Industrial Waste Designated Facility

F. Generation of waste ceased or Site closed at this location check one and enter the date (mm/dd/yyyy):

- ☐ 1. No longer generating hazardous, liquid industrial, or universal waste; still in business at this location
- ☐ 2. No longer generating hazardous, liquid industrial, or universal waste; out of business at this location

Date site ceased generating waste: _____

XI. Certification: I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment.

Signature of owner, operator, or authorized representative

Name of owner, operator, or authorized representative and Official Title (type or print)

Date Signed (mm-dd-yyyy)

XII. Comments:



CITY OF DETROIT
WATER AND SEWERAGE DEPARTMENT
INDUSTRIAL WASTE CONTROL DIVISION

303 S. LIVERNOIS AVENUE
DETROIT, MICHIGAN 48209
PHONE 313•297•9400
FAX 313•297•5860
WWW.CI.DETROIT.MI.US

WASTEWATER DISCHARGE PERMIT PERMIT NO.: 021-001

SECTION A: GENERAL INFORMATION

Facility I.D. No.: 004601

Company Name: Apollo Plating, Inc.

Facility Address: 15765 Sturgeon
Roseville, MI 48066

Mailing Address: Same as above

The Detroit Water and Sewerage Department (DWSD) hereby authorizes the Industrial User specified above to discharge industrial wastewater to the City of Detroit sewer system. This authorization is granted in accordance with the City's Wastewater Discharge Ordinance or equivalent local ordinance and any applicable provisions of federal or state laws or regulations.

The requirements and conditions established in this permit do not relieve the company of its obligation to comply with any applicable pretreatment regulations, standards, requirements, or laws that may become effective during the term of this permit.

In addition, this permit is granted in accordance with the application filed with DWSD, and in conformity with plans, specifications, and other substantive data submitted to the Department in support of the above application.

To continue discharging industrial wastewater after the expiration date, it is the responsibility of the Industrial User to submit an application for permit reissuance at least ninety (90) days before the expiration of the existing permit. The permit reapplication form may be requested from this Department.

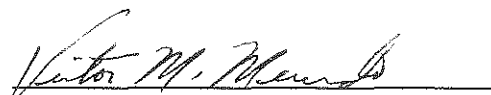
Effective Date: March 2, 2003

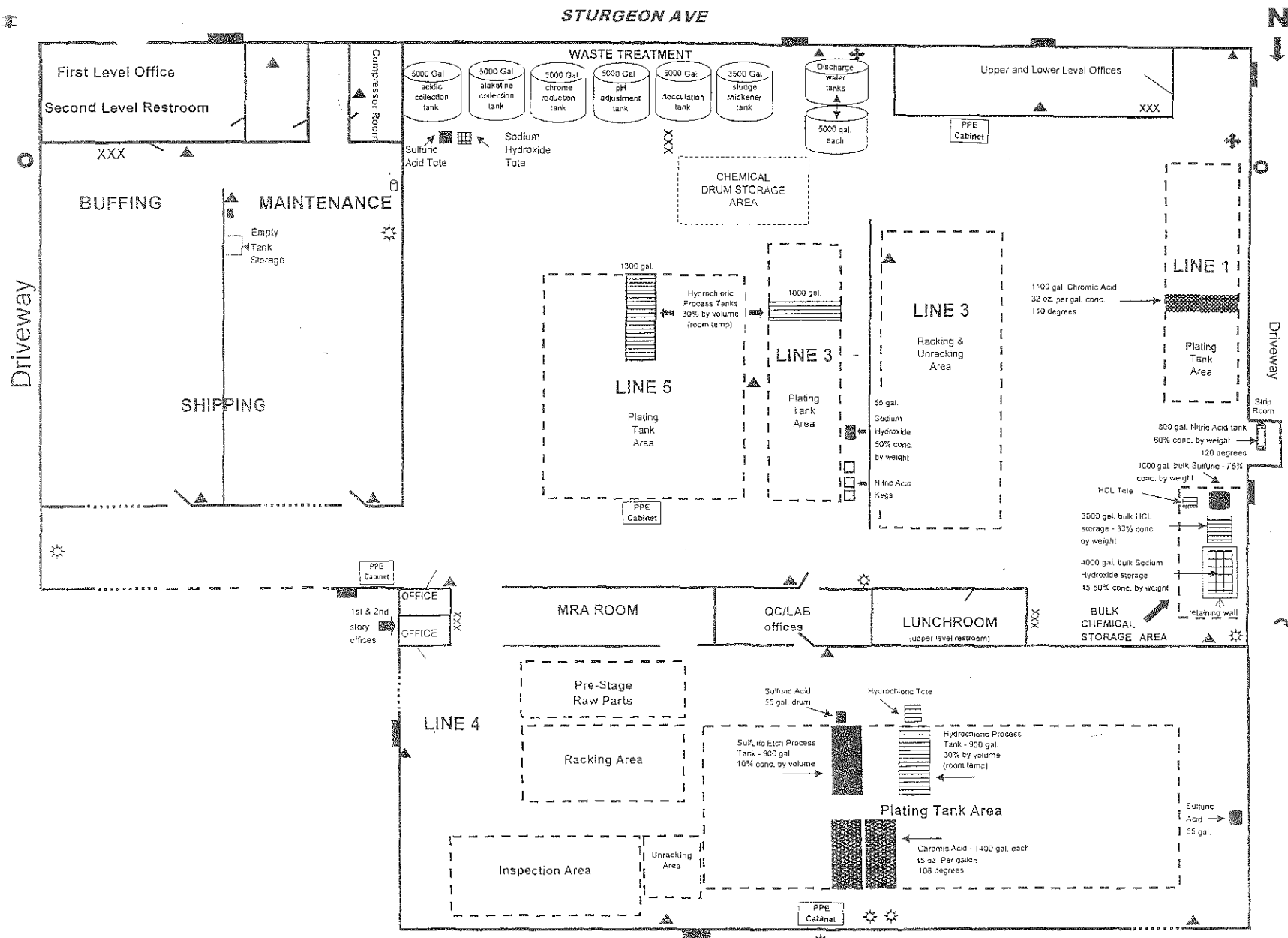
Expiration Date: March 1, 2008

Issued by:


Stephen J. Kuplicki
Manager, IWC

Authorized by:


Victor M. Mercado
Director



KEY

	Oxygen Tank		Sodium Hydroxide		Water Shut-off
	Acetylene tank		Exit door		Gas Shut-off
	Sulfuric Acid		XXX Sign		Electrical Shut-off
	Hydrochloric Acid		Roll-up door		Fire Extinguisher
	Chromic Acid		Storm Drain		Fire Hydrant
	Nitric Acid				

APOLLO PLATING, INC.
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